

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Consolidated Civil Action**

RALEIGH WAKE CITIZENS
ASSOCIATION, et al.

Plaintiffs,

v.

WAKE COUNTY BOARD
OF ELECTIONS,

Defendant.

No. 5:15-cv-156

CALLA WRIGHT, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA,
et al.,

Defendants.

No. 5:13-cv-607

**DECLARATION OF ANITA S. EARLS IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, EXPERT FEES, AND LITIGATION EXPENSES**

I, Anita S. Earls, declare under penalty of perjury that the following is true and correct:

1. I am counsel for all Plaintiffs in the above-styled consolidated actions.
2. I am the Executive Director of the Southern Coalition for Social Justice in Durham, NC. My organization was retained in 2013 to represent Plaintiffs in *Wright v. North Carolina*, an equal protection challenge to the 2013 redistricting plan for the Wake County Board

of Education, and in 2015 to represent the Plaintiffs in *Raleigh Wake Citizens Association v. Wake County Board of Elections*, an equal protection challenge to the identical 2015 redistricting plan for the Wake County Board of Commissioners.

3. I am a 1988 graduate of Yale Law School and was admitted to practice law in the State of North Carolina in April 1988. I have been a member of the Supreme Court Bar since June 1994, and a member of the District of Columbia Bar since 2001. I am admitted to practice in each of the Federal District Courts in the State of North Carolina.

4. I have extensive experience representing plaintiffs in voting rights cases in state and federal courts, including cases brought under the Voting Rights Act of 1965 and U.S. Constitution, and cases raising state statutory and constitutional voting rights claims.

5. I have argued voting rights cases in the 1st, 4th, and 11th Circuit Courts of Appeals, including winning an en banc argument in the U.S. Court of Appeals for the First Circuit.

6. In addition, I have written numerous briefs for the United States Supreme Court, including the brief for Defendant-Intervenors in *Shaw v. Hunt*, congressional redistricting litigation in the 1990s, and for Defendant-Intervenors in *Dean v. Leak*, legislative redistricting litigation from the Eastern District of North Carolina.

7. I was lead counsel in *NAACP v. Harris*, No. 01-civ-120 (S.D. Fla. 2001), federal court litigation raising voting rights claims on behalf of the Florida NAACP in Florida following the 2000 election.

8. Overall, I have been counsel in over 30 federal cases raising a variety of voting rights claims. Attached as Exhibit A to this Declaration is a list of reported opinions in cases involving voting rights claims in which I served as counsel for a party in the case and in which I

have taken an active role in the litigation. Exhibit A does not include voting rights cases that were resolved by settlement or without reported opinions, cases in which I have submitted amicus briefs, and cases currently pending where no published opinion has been issued.

9. I have been an Adjunct Professor at University of North Carolina School of Law and University of Maryland School of Law; an Adjunct Professor in the African and African-American Studies Department at Duke University; and I held the post of a Visiting Research Fellow at the Social Science Research Institute, Center for Race, Ethnicity and Gender in the Social Sciences in 2009-2012, conducting research on census and redistricting issues. I have published articles on voting rights issues in law reviews, popular journals and edited volumes, and I have been a presenter at many continuing legal education programs, conferences, and forums.

10. In July 2009, I was appointed by Governor Perdue to serve on the North Carolina State Board of Elections. In 2006, I was appointed to the North Carolina Equal Access to Justice Commission by the Chief Justice of the North Carolina Supreme Court, and I served as Secretary for the Commission.

11. In 1998 I was appointed by President Clinton to serve as a Deputy Assistant Attorney General in the Civil Rights Division of the U.S. Department of Justice. As part of my duties, I had responsibility for the Voting Section of the Civil Rights Division. I was the Director of the Voting Rights Project for the Lawyers' Committee for Civil Rights Under Law in Washington, D.C. for two and a half years. My CV is attached as Exhibit B.

12. As Executive Director for the Southern Coalition for Social Justice, I have ultimate supervisory responsibility for all staff, including all attorneys, legal fellows, interns and support staff. We employ a variety of electronic tools to assist staff in keeping contemporaneous

time records of their work on cases in litigation and on all other matters. During the course of this litigation, it was my responsibility to administer our primary timekeeping program and to ensure that staff who use alternative electronic resources to record their time do so in a manner that is retrievable and compatible with our primary system. All staff at SCSJ are required to keep contemporaneous time records, including administrative staff members, and those records are reviewed by their supervisors.

13. Allison Riggs is a senior attorney at the Southern Coalition for Social Justice, where her practice focuses almost exclusively on voting rights.

14. Ms. Riggs is a 2009 graduate of the University of Florida Levin College of Law and was admitted to practice law in the State of North Carolina in August of 2009. She is admitted to practice in the Middle and Eastern District Courts in North Carolina, the Fourth Circuit Court of Appeals, and has been a member of the Supreme Court Bar since 2012. Her resume is attached as Exhibit C.

15. Ms. Riggs has extensive experience representing plaintiffs in voting rights cases in state and federal courts, including cases brought under the Voting Rights Act of 1965 and the U.S. Constitution, and cases raising state statutory and constitutional voting rights claims.

16. Ms. Riggs has argued voting rights cases in the 4th Circuit and Florida Supreme Court.

17. Ms. Riggs has written briefs for the United States Supreme Court in approximately a dozen cases to date, all of which involved voting rights issues.

18. Overall, Ms. Riggs has been counsel in over 25 voting rights cases, including four cases litigating statewide redistricting plans following the 2010 decennial census—Texas, North

Carolina, Tennessee and Florida. Her resume, attached as Exhibit C, includes a list of the voting rights cases she has litigated.

19. Ms. Riggs has additionally been a visiting professor and guest lecturer at Duke University, North Carolina Central University, University of North Carolina, and Harvard University law schools. She has been a presenter at many continuing legal education programs, conferences, and forums.

20. George Eppsteiner was a staff attorney at the Southern Coalition for Social Justice from August 2014 to August 2016, and his practice with us focused almost exclusively on voting rights.

21. Mr. Eppsteiner is a 2010 graduate of the University of Florida Levin College of Law, was admitted to practice law in Florida in September 2010 and was admitted to practice law in the State of North Carolina in August 2011. He is admitted to practice law in the Middle and Eastern District Courts in North Carolina, the Fourth Circuit Court of Appeals and the U.S. Supreme Court. His resume is attached as Exhibit D.

22. Mr. Eppsteiner has experience representing plaintiffs in voting rights cases in state and federal courts, including cases brought under the Voting Rights Act of 1965 and the U.S. Constitution, and cases raising state statutory and constitutional voting rights claims.

23. Emily Seawell is a staff attorney at the Southern Coalition for Social Justice, where her practice focuses almost exclusively on voting rights.

24. Ms. Seawell is a 2015 graduate of Elon University School of Law and was admitted to practice law in North Carolina in 2016. She is admitted to practice law in the Middle and Eastern District Courts in North Carolina. Her resume is attached as Exhibit E.

25. Ms. Seawell has experience representing plaintiffs in voting rights cases in state and federal courts, including cases brought under the Voting Rights Act of 1965 and the U.S. Constitution, and cases raising state statutory and constitutional voting rights claims.

26. Ms. Seawell has assisted in drafting briefs for the United States Supreme Court in several cases to date, all of which involved voting rights issues.

27. Overall, Ms. Seawell has been counsel or has supported counsel of record in nine voting rights cases, including five redistricting cases. Her resume, attached as Exhibit E, includes a list of the voting rights cases she has litigated.

28. Ms. Seawell has additionally been a guest speaker at Elon and Campbell law schools in North Carolina, and has been a presenter at a number of community forums.

A. Requested Attorneys' Fees

29. Below is a table summarizing all the time that Plaintiffs are seeking fees for, and shows the 10% discount in time taken for time spent on the Plaintiffs' racial gerrymander claim.

Southern Coalition for Social Justice - Wright/RWCA - Attorneys' Fees Summary

Billable Time

Wright Case Only

| Timekeeper | Position | Hours | Hourly Rate | Total Amount Billed |
|---------------------|---------------------------|--------------|--------------------|----------------------------|
| Anita Earls | Executive Director | 264.68 | \$ 550 | \$ 145,574.00 |
| Allison Riggs | Senior Attorney | 66.02 | \$ 400 | \$ 26,408.00 |
| Christopher Ketchie | Policy Analyst | 67.25 | \$ 225 | \$ 15,131.25 |
| Emily Seawell | Legal Fellow (unlicensed) | 11.4 | \$ 200 | \$ 2,280.00 |
| Jeremy Collins | Legal Fellow (unlicensed) | 21.75 | \$ 200 | \$ 4,350.00 |
| Christopher Heaney | Legal Fellow (licensed) | 5.36 | \$ 250 | \$ 1,340.00 |

TOTAL - Wright only 436.46 \$ 195,083.25

RWCA Case Only

| Timekeeper | Position | Hours | Hourly Rate | Total Amount Billed |
|-------------------|--------------------|--------------|--------------------|----------------------------|
| Anita Earls | Executive Director | 47.85 | \$ 550 | \$ 26,317.50 |

| | | | | |
|---------------|---------------------------|------|--------|-------------|
| Emily Seawell | Legal Fellow (unlicensed) | 6.58 | \$ 200 | \$ 1,316.00 |
| Joseph Crupi | Legal Intern (unlicensed) | 8.25 | \$ 150 | \$ 1,237.50 |

TOTAL - RWCA only 62.68 \$ 28,871.00

RWCA/Wright - Consolidated

| Timekeeper | Position | Hours | Hourly Rate | Total Amount Billed |
|---------------------|---------------------------------|--------|-------------|---------------------|
| Anita Earls | Executive Director | 390.8 | \$ 550 | \$ 214,940.00 |
| Allison Riggs | Senior Attorney | 389.11 | \$ 400 | \$ 155,644.00 |
| George Eppsteiner | Staff Attorney | 110.3 | \$ 300 | \$ 33,090.00 |
| Emily Seawell | Staff Attorney (post-licensure) | 145.74 | \$ 250 | \$ 36,435.00 |
| Emily Seawell | Legal Fellow (unlicensed) | 175.89 | \$ 200 | \$ 35,178.00 |
| Christopher Ketchie | Policy Analyst | 23 | \$ 225 | \$ 5,175.00 |
| Dr. Fred McBride | Senior Policy Analyst | 108.2 | \$ 225 | \$ 24,345.00 |
| Jaclyn Maffetore | Legal Extern (unlicensed) | 44.3 | \$ 150 | \$ 6,645.00 |

TOTAL - Consolidated cases 1387.34 \$511,452.00

Total Billable Amount \$ 735,406.25

Less 10% Reduction of Hours in RWCA for Unsuccessful Claim (\$54,032.30)

Total Amount Claimed \$ 681,373.95

30. Plaintiffs are seeking payment for 264.68 hours of my time in the *Wright* case only, for 43.07 hours of my time in the *RWCA* case only, and for 351.70 hours in the consolidated cases. My time records were kept contemporaneously with the work performed. Pre-litigation work in *Wright* began on March 20, 2013 when clients first contacted me about the proposed legislation to change the method of electing the Wake County Board of Education, and the *Wright*-only work included briefing and argument on Defendants' motion to dismiss in the trial and appeals courts. Pre-filing work in *RWCA* began on March 6, 2015, and included work relating only to *RWCA* until shortly before the cases were consolidated in September 2015 for an expedited discovery period and three-day trial. The cases remained consolidated on appeal and

during the remedy phase. Plaintiffs' counsel are not double billing for time spent on the two cases, but instead billing for their total time spent. The claimed amount is the total lodestar amount—determined by multiplying my hourly rate of \$550 per hour by the hours I reasonably and necessarily worked on this litigation. I have attached a table summarizing all SCSJ hours in this case as Exhibit F, along with the detailed time records for each timekeeper.

31. In the course of this litigation, I have served as a lead litigator and trial counsel. My work in representing all Plaintiffs consisted of advising my clients during the legislative process; legal research; trial strategizing; witness preparation; examining and cross-examining witnesses at trial; drafting and reviewing discovery requests and responses; communicating with opposing counsel; interacting with and directing the work of experts; attending hearings and trial; bearing primary responsibility for drafting and arguing remedial briefs and motions; and much more.

32. Given my experience in voting rights litigation, I am requesting an award of \$550 per hour for my work in this litigation. In my opinion, this reflects the usual and customary rate for an attorney of my years of experience and specialized skill.

33. I possess the requisite understanding of relevant evidence to prosecute claims under the Fourteenth Amendment. I have frequently recruited and directed the work of both quantitative and qualitative social science experts in support of voting rights claims. Given this necessary knowledge and experience, my claimed hourly rate is warranted and reasonable.

34. Plaintiffs are claiming \$182,052 in attorneys' fees for the work Allison Riggs performed in this litigation in these consolidated cases. Her time was kept contemporaneously with the work she performed. The claimed amount is the total lodestar amount—determined by

multiplying her hourly rate of \$400 per hour by the 455.13 hours she reasonably and necessarily worked on this litigation. A table summarizing her hours in this case is attached as Exhibit F.

35. In the course of this litigation, Ms. Riggs has served as a primary litigator and trial counsel. Her work in representing all Plaintiffs consisted of legal research; trial strategizing; witness preparation; examining and cross-examining witnesses at trial; drafting and reviewing discovery requests and responses; communicating with opposing counsel; interacting with and directing the work of experts; coordinating witnesses and exhibits; attending hearings and trial; bearing primary responsibility for drafting Plaintiffs' trial brief and proposed findings of fact and conclusions of law; and much more.

36. Given Ms. Riggs' experience in voting rights litigation, she is requesting an award of \$400 per hour for her work in this litigation. In my opinion, this reflects the usual and customary rate for an attorney of her experience and skill.

37. Ms. Riggs possesses the requisite understanding of relevant evidence to prosecute claims under the Fourteenth Amendment. She has frequently recruited and directed the work of both quantitative and qualitative social science experts in support of voting rights claims. Given this necessary knowledge and experience, her claimed hourly rate is warranted and reasonable.

38. Plaintiffs are claiming \$33,090 in attorneys' fees for the work George Eppsteiner performed in this litigation in these consolidated cases. Mr. Eppsteiner's time was kept contemporaneously with the work performed. The claimed amount is the total lodestar amount—determined by multiplying his hourly rate of \$300 per hour by the 110.3 hours he reasonably and necessarily worked on this litigation. A table summarizing his hours in this case is attached as Exhibit F.

39. In the course of this litigation, Mr. Eppsteiner served as a secondary litigator and trial counsel. His work in representing all Plaintiffs consisted of legal research; trial strategizing; witness preparation; examining and cross-examining witnesses at trial; attending hearings and trial; and more.

40. Given Mr. Eppsteiner's experience in voting rights litigation, he is requesting an award of \$300 per hour for his work in this litigation. In my opinion, this reflects the usual and customary rate for an attorney of his experience and skill.

41. Mr. Eppsteiner possesses the requisite understanding of relevant evidence to prosecute claims under the Fourteenth Amendment. Given this necessary knowledge and experience, his claimed hourly rate is warranted and reasonable.

42. Plaintiffs are claiming \$36,435 in attorneys' fees for the work Emily Seawell performed in this litigation in these consolidated cases. Her time records were kept contemporaneously with the work performed. The claimed amount is the total lodestar amount—determined by multiplying her hourly rate of \$250 per hour by the 145.74 hours she reasonably and necessarily worked on this litigation. A table summarizing her hours in this case is attached as Exhibit F.

43. In the course of this litigation, Ms. Seawell served as litigation support for trial counsel. Her work on behalf of all Plaintiffs consisted of advising clients during the legislative process; legal research; drafting and reviewing discovery requests and responses; communicating with opposing counsel; coordinating witnesses; attending hearings and trial; bearing secondary responsibility for drafting Plaintiffs' trial brief and proposed findings of fact and conclusions of law; and much more.

44. Given Ms. Seawell's experience in voting rights litigation, she is requesting an award of \$250 per hour for her work in this litigation. In my opinion, this reflects the usual and customary rate for an attorney of her experience and skill.

45. Ms. Seawell possesses the requisite understanding of relevant evidence to prosecute claims under the Fourteenth Amendment. Given this necessary knowledge and experience, her claimed hourly rate is warranted and reasonable.

46. Plaintiffs are claiming a combined \$51,109 in fees for the work of Emily Seawell and Jeremy Collins, who spent 193.87 and 21.75 hours on this action, respectively, at a rate of \$200/hour as law clerks for the Southern Coalition for Social Justice before taking the North Carolina bar exam; Jaclyn Maffetore, who spent 44.3 hours on this action at a rate of \$150/hour as a legal intern for the Southern Coalition for Social Justice; as well as Christopher Heaney, who spent 2.175 hours on this action at a rate of \$250/hour as a law clerk after passing the North Carolina bar exam. The law clerks' hours were devoted to tasks such as client and witness management, legal research, drafting legal documents, and providing pretrial, trial, and appellate support. Tables summarizing Ms. Seawell, Mr. Collins, Ms. Maffetore, and Mr. Heaney's hours in this case are attached as Exhibit F. In my opinion, their hourly rates reflect the usual and customary rate for law clerks of their experience and skill.

47. Plaintiffs are am claiming a combined \$44,651.25 in fees for the work of Dr. Frederick McBride and Christopher Ketchie, who were employed by Plaintiffs as specialists in geographic information systems. Dr. McBride spent 108.2 hours on this consolidated action at an hourly rate of \$225, and Mr. Ketchie spent 90.25 hours on this action at an hourly rate of \$225. Those hours were devoted to tasks such as researching demographics and maps, constructing shapefiles and preparing block assignment files for the challenged redistricting

plans, geocoding incumbent residences, analyzing precinct splits, analyzing election returns, preparing work product for Defendant's requests for production of documents, and assisting expert witnesses in understanding the case and preparing their analyses. Tables summarizing Dr. McBride and Mr. Ketchie's hours in this case are attached as Exhibit F. In my opinion, their hourly rates are reasonable for policy analysts of their experience and skill.

48. Plaintiffs' counsel and support staff worked carefully together to ensure that efforts were not duplicated, and we conferred regularly by phone with opposing counsel to divide up and streamline the joint trial preparation we undertook in this litigation to ensure that our efforts and trial were efficient.

49. Using the factors outlined by the Fifth Circuit in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717 (5th Cir. 1974), our requested awards are appropriate. As discussed in more detail in Plaintiffs' Motion for Attorneys' Fees, Expert Fees, and Litigation Expenses, this litigation involved extremely complicated legal and factual issues. My staff's expertise in voting rights, the history of discrimination in voting, and complex civil rights litigation was necessary to advance the interests of our clients in this litigation. The obligations imposed by this litigation—briefing requirements for trial and during the remedy phase, time spent in trial and hearings, and more—had a great impact on our ability to take on other voting rights cases. The time limitations imposed by the circumstances in this expedited litigation—tight deadlines for briefing and impending election deadlines, for example—further lend support to our claims for fees.

50. This case was very difficult and complicated, and involved balancing interests between different racial and ethnic groups. The case involves Fourteenth Amendment issues yet to be resolved by the United States Supreme Court.

51. As fully explained in the Memorandum in Support of Motion for Attorney Fees, Expert Fees, and Litigation Expenses, I have exercised appropriate billing judgment and limited the hours for which Plaintiffs seek compensation. To account for *RWCA* Plaintiffs' limited success on their racial gerrymandering claim, I have applied a ten percent reduction to the hours for which Plaintiffs seek compensation beginning with the time the *RWCA* complaint was drafted. Taking into account both reductions, I have written off a total of \$54,032.30 in fees.

B. Reasonable Expert Fees

52. Plaintiffs are also claiming a combined \$32,813.42 in expert fees paid to the Plaintiffs' expert witnesses Anthony Fairfax and Dr. Jowei Chen. A table summarizing the claimed expert fees is attached as Exhibit A to the Declaration of Allison J. Riggs dated November 23, 2016.

53. Mr. Fairfax owns and runs a demographic analysis firm that provides Census-based analyses and services to clients across the southeastern United States. Mr. Fairfax charged \$2,000 for the production of his report and \$1,700 per day for the two days of trial work. Mr. Fairfax expended that time communicating with Plaintiffs' counsel, researching the challenged redistricting plans and demographics in Wake County, conducting a statistical analysis of those plans and demographics, performing quality control on his results, drafting and editing an expert report, and preparing and delivering testimony in support of his findings.

54. Dr. Chen is a professor at the University of Michigan who specializes in computer modeling and statistical analysis and who has provided expert services in a number of other redistricting matters. Dr. Chen spent 40 hours at an hourly rate of \$500, \$2,000 a day for three days of trial work, and \$1,413.42 in travel expenses. He expended this time communicating with Plaintiffs' counsel, researching the challenged redistricting plans and demographics in Wake

County, creating and running a series of statistical computer models to analyze the challenged redistricting plans, conducting a statistical analysis of those plans and demographics, performing quality control on his results, drafting and editing an expert report, and preparing and delivering testimony in support of his findings.

55. In my opinion, Mr. Fairfax and Dr. Chen's hourly rates for their services are reasonable in light of their expertise in redistricting matters, the prevailing market rates for experts of their caliber in voting rights cases, and the novelty of the claims and time constraints under which they were asked to perform.

C. Reasonable Litigation Expenses and Costs

56. Plaintiffs are also claiming \$56,831.34 in costs associated with the litigation. Of that, \$47,773.66 is for non-taxable costs, including travel expenses, expert fees and the like. The remaining \$9,057.68 is for taxable costs. A table summarizing the claimed taxable and non-taxable costs is attached as Exhibit A to the Declaration of Allison J. Riggs.

57. In my opinion, and as detailed in Plaintiffs' Memorandum in Support of Motion for Attorney Fees, Expert Fees, and Litigation Expenses and Memorandum in Support of Application for Costs, these expenses were reasonably incurred in the course of providing effective representation to Plaintiffs, and Plaintiffs' counsel made appropriate efforts throughout the litigation to reduce unnecessary expenses.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 23, 2016.



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EXHIBIT A

EXHIBIT A

U.S. Supreme Court

1. *Dickson v. Rucho*, 135 S. Ct. 1843; 191 L. Ed. 2d 719; (2015). On remand at *Dickson v. Rucho*, 368 N.C. 270, 781 S.E. 2d 404 (2015).
2. *Shaw v. Hunt*, 517 U.S. 899; 116 S. Ct. 1894; 135 L. Ed. 2d 207 (1996); 861 F. Supp. 408 (E.D. N.C. 1994).
3. *Reno v. Bossier Parish Sch. Bd.*, 528 U.S. 320; 120 S. Ct. 866; 145 L. Ed. 2d 845 (2000).

U.S. Courts of Appeals

4. *League of Women Voters v. North Carolina*, 831 F.3d 204, 237 (4th Cir. 2016).
5. *LaRoque v. Holder*, 679 F.3d 905; (D.C. Cir. 2012) cert. denied by *Nix v. Holder*, 2012 U.S. LEXIS 8809 (U.S., Nov. 13, 2012).
6. *N.C. Right to Life Comm. Fund v. Leake*, 524 F.3d 427 (4th Cir. 2008), cert. denied *Duke v. Leake*, 2008 U.S. LEXIS 8014 (U.S., Nov. 3, 2008).
7. *Hayden v. Pataki*, 449 F.3d 305 (2nd Cir. 2006).
8. *Muntaqim v. Coombe*, 449 F.3d 371 (2nd Cir. 2006).
9. *Hall v. Virginia*, 385 F.3d 421 (4th Cir. 2004), aff'g 276 F. Supp. 2d 528 (E.D. Va. 2003), cert. denied, 2005 U.S. LEXIS 2973 (U.S., Apr. 4, 2005).
10. *Metts v. Murphy*, 363 F.3d 8 (1st Cir. 2004), rev'g *Metts v. Almond*, 217 F. Supp. 2d 252 (R.I. 2002).
11. *Johnson v. Hamrick*, 296 F.3d 1065 (11th Cir. 2002); 115 F. Supp.2d 1355 (N.D. Ga. 2001).
12. *Wilson v. Minor*, 220 F.3d 1297 (11th Cir. 2000).
13. *Cannon v. Durham County Bd. of Elections*, 129 F.3d 116, (4th Cir. 1997) (table) opinion at 1997 U.S. App. LEXIS 31794.
14. *Gause v. Brunswick County*, 92 F.3d 1178, (4th Cir. 1996) (table) opinion at 1996 U.S. App. LEXIS 20237.
15. *Republican Party v. North Carolina State Bd. of Elections*, 27 F.3d 563 (4th Cir. 1994) (table) opinion at 1994 U.S. App. LEXIS 14961.

16. *Moore v. Beaufort County*, 936 F.2d 159 (4th Cir. 1991).

U.S. District Courts

17. *Covington v. N.C.*, 316 F.R.D. 117 (M.D.N.C. 2016).

18. *George v. Haslam*, 112 F. Supp. 3d 700 (M.D. Tenn. 2015).

19. *Dean v. Leake*, 550 F. Supp. 2d 594 (E.D.N.C. 2008), *appeal dismissed* 2008 U.S. LEXIS 6697 (U.S., Oct. 6, 2008).

20. *Johnson v. Bush*, 214 F. Supp. 2d 1333 (S.D. Fla. 2002); *aff'd in part and rev'd in part by*, *Johnson v. Governor of Fla.*, 2003 U.S. App. LEXIS 25859 (11th Cir. Fla., Dec. 19, 2003).

21. *Ward v. Columbus County*, 782 F. Supp. 1097 (E.D. N.C. 1991).

22. *McGhee v. Granville County*, 860 F.2d 110 (4th Cir. 1988).

23. *NAACP-Greensboro Branch v. Guilford County Bd. of Elections*, 858 F. Supp. 2d 516 (M.D. N.C. 2012).

EXHIBIT B

ANITA S. EARLS

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PROFESSIONAL SUMMARY

A civil rights attorney with 28 years of experience addressing structural racism, protecting minority voting rights, and advocating for fair and equitable opportunities for all people. An innovative and passionate leader committed to racial justice in the south, with extensive experience in North Carolina and broad connections nationally among social justice practitioners and philanthropic professionals.

EDUCATION

Yale Law School, New Haven, Connecticut.
J.D., January, 1988. Senior Editor, Yale Law Journal.

Thomas J. Watson Fellowship, 1981-1982.
Studying cooperative work organizations and the role of women in Chekereni Ujamaa Village, Tanzania; and the cooperative movement in Italy and England.

Williams College, Williamstown, Massachusetts.
B.A. Magna Cum Laude, June 1981. Major in Political Economy (Honors), and Philosophy. Honors and Awards: Phi Beta Kappa; Lehman Scholarship; National Achievement Scholarship.

EXPERIENCE

Southern Coalition for Social Justice, Durham, N.C.
Executive Director, September 2007 to present.

Founder and Director of non-profit advocacy organization engaged in community lawyering with a human rights perspective to empower communities of color and economically disadvantaged communities in the south.

- Established innovative and multi-disciplinary program of advocacy across interrelated issue areas grounded in strong partnerships with community-based organizations.
- Raise and manage \$1.3 million budget annually, lead 12 full-time staff.
- Litigate precedent-setting voting rights cases in state and federal court.
- Convene the Fair Redistricting Collaborative, and Southern Leadership for Voter Engagement, both regional coalitions of voting rights advocates; facilitate New Southern Strategy Coalition to address collateral consequences of convictions; co-lead national working group of voting rights attorneys.
- Lead strategic planning and assessment of program effectiveness.
- Foster internal racial equity initiative, and promote staff development generally.
- Support SCSJ's Board of Directors, predominantly people of color, consistent with the organization's mission of being community-led.

Duke University, Durham, N.C.
Visiting Research Fellow, Social Science Research Institute, Center for Race, Ethnicity and Gender in the Social Sciences, 2009 – 2012. Conducting research on census and redistricting issues. Partnered with key faculty to conduct the Community Census and Redistricting Institute in 2010.

Adjunct Professor, spring 2004 & 2006. Taught undergraduate seminars for the African and African-American Studies Department on civil rights litigation topics.

University of North Carolina Law School, Chapel Hill, N.C.

Adjunct Professor, fall 2006, spring 2008. Taught two upper level seminars – Constitution and the Political Process; and Race, Residence & Municipal Exclusion, both involving rigorous writing experience for students.

UNC Center for Civil Rights, Chapel Hill, N.C.

Director of Advocacy, August 2003 to September 2007. Developed and supervised implementation of civil rights advocacy program, including complex litigation, policy analysis, public education and other activities in voting rights, education and community development law.

Lawyers' Committee for Civil Rights Under Law, Washington, D.C.

Director, Voting Rights Project and Coordinator, Police Misconduct Initiative, December 2000 to July 2003. Responsible for major civil rights litigation, public education efforts, and related public policy advocacy. Led a multi-organization litigation team challenging the disenfranchisement of voters in the 2000 general election in Florida, *NAACP v. Harris*; argued successfully *en banc*

University of Maryland Law School, Baltimore, MD

Adjunct Professor, spring 2002. Taught Voting Rights Seminar to 2nd and 3rd year students, supervised analytical writing assignments.

Civil Rights Division, U.S. Department of Justice, Washington, D.C.

Deputy Assistant Attorney General for Civil Rights, April 1998 to August 2000. Participated in policy decisions and directed the Division's litigation efforts. Responsible for Voting, Coordination and Review, Educational Opportunities and Disability Rights sections of the Civil Rights Division. Key policy achievements included revisions to the Department's Guidance under Section 5 of the Voting Rights Act, new Title VI regulations for all federal agencies, Guidance on federal grantees' responsibilities to serve limited English proficient members of the public, and Guidance on the aggregation of multi-racial census data for civil rights enforcement purposes.

Ferguson, Stein, Wallas, Adkins, Gresham & Sumter, Charlotte, N.C.

Partner, January 1993 to April 1998.

Associate, January 1988 to December 1992. Trial lawyer in civil rights litigation in state and federal court including voting rights, employment discrimination, and police misconduct cases; criminal defense; general litigation. Represented intervenors in *Shaw v. Hunt* voting rights litigation.

The Nation Institute, New York, N.Y.

Robert Masur Fellow in Civil Liberties, March to September 1987. Research and writing on civil rights and constitutional issues.

Sheehan & Solomon, New Haven, CT

Intern, Summer 1986. Student-Funded Fellowship position; assisted civil rights litigation involving sexual harassment claims and represented victims of domestic violence.

Professor Drew S. Days, Yale Law School.

Research Assistant, Summer 1985. Developed, organized and edited materials for Canadian Human Rights course.

Hallmark, Carter & Atkinson, Solicitors, London, U.K.

Caseworker/Secretary, Jan. 1983 - June 1985. Initially helped organize legal aid practice. Assumed responsibility for matrimonial and domestic violence cases including interviewing clients, preparing papers, and attending court. Investigated claims and prepared briefs in housing, criminal and social security cases.

PUBLICATIONS

“Voting Rights in North Carolina: 1982-2006,” 17 S. Cal. Rev. L. & Soc. Just. 577 (2008) (co-authors Emily Wynes & LeeAnne Quatrucci).

“Voting Rights in Virginia: 1982-2006,” 17 S. Cal. Rev. L. & Soc. Just. 761 (2008) (co-authors Millonzi, Seliski & Dixon).

“Introduction: Advancing minority voting rights : how do we get from here to there?” in Voting Rights and Minority Representation, 1 (D. Bositis, ed. 2006).

“Equal Effects,” Legal Affairs, Nov.-Dec. 2003 at 22-23.

"Where You Counted?--Civil Rights and the 1990 Census," in One Nation, Indivisible: The Civil Rights Challenge for the 1990's, 352 (R. Govan & W. Taylor, eds. 1989) (co-author, J. Steinberg).

Note, "Petitioning and the Empowerment Theory of Practice," 96 Yale L.J. 569 (1987).

PROFESSIONAL & COMMUNITY ACTIVITIES

Faculty and Advisory Board Member, Shriver Center Racial Justice Training Institute (2014 to Present).

Board Member, Blueprint North Carolina (2013 to Present).

Board Member, Beloved Community Center (2013 to Present).

Fellow, Rockwood Year-Long Leading from the Inside Out Program (2010 to 2011).

Board Member, Durham Economic Resource Center (2010 to 2012).

Member, North Carolina State Board of Elections (July 2009 to September 2011).

Secretary, North Carolina Equal Access to Justice Commission (2006 to 2014).

Volunteer, Legal Information Service, The Women's Center, Chapel Hill, N.C. (2003 to 2009).

Board President, Legal Services of Southern Piedmont (1997 to 1998).

Board Chair, Chemical Dependency Center of Charlotte-Mecklenburg (1997 to 1998).

Member, Commission on Race Relations in the Legal Profession (1996 to 1998).

Board Member, ACLU of North Carolina (1995 to 1998).

EXHIBIT C

Allison Riggs
Senior Staff Attorney
Southern Coalition for Social Justice
1415 W. Highway 54, Suite 101
Durham, NC 27707
E-mail: Allison@southerncoalition.org
Phone: 919-323-3380 ext. 117
Fax: 919-323-3942

Vitae – Current as of November 2016

Education

- 2003 B.S. University of Florida
- 2006 M.A. University of Florida (in History)
- 2009 J.D. University of Florida Levin College of Law

Admissions

- 2009 State of North Carolina
- 2011 United States District Court for the Eastern District of North Carolina
- 2012 United States District Court for the Middle District of North Carolina
- 2014 United States Court of Appeals for the Fourth Circuit
- 2012 United States Supreme Court

Employment History

- 2009-2014 Staff Attorney
 Southern Coalition for Social Justice
 Durham, NC
- 2014 – present Senior Staff Attorney
 Southern Coalition for Social Justice
 Durham, NC

Voting Rights Cases

- 2016 – present – League of Women Voters of North Carolina v. Rucho
-Case No. 1:16-cv-1164 (M.D.N.C.)

-counsel for plaintiffs alleging that the 2016 remedial North Carolina congressional redistricting plan is an unconstitutional partisan gerrymander

2016 – present – *Howell v. McAuliffe*

-Case No. 160784 (Virginia Supreme Court)

-counsel for Virginia NAACP as amicus in support of petitioner in mandamus action challenging Governor McAuliffe's authority to restore the right to vote to Virginians with past felony convictions.

2015 – present – *Action NC v. Strach*

-Case No. 1:15-cv-01063 (M.D.N.C.)

-counsel for plaintiffs alleging violations by the North Carolina State Board of Elections, Department of Motor Vehicles, and Department of Health and Human Services of the National Voter Registration Act

2015 – present – *Raleigh Wake Citizens Association v. Wake County Board of Elections*

-Case No. 5:15-cv-156 (E.D.N.C.)

-counsel for plaintiffs challenging a local bill restructuring the Wake County Board of County Commissioners, alleging violations of the Equal Protection Clause.

2015 – present – *City of Greensboro v. Guilford County Board of Elections*

-Case No. 1:15-CV-559 (M.D.N.C.)

-counsel for plaintiffs challenging a local bill restructuring the Greensboro City Council and removing from the city the ability to change its method of election via referendum, alleging violations of the Equal Protection Clause; injunction issued in July 2015.

2013 – present – *LWV NC v. North Carolina*

-Case No. 1:13-cv-660 (M.D.N.C.)

-counsel for plaintiffs challenging the state's omnibus voter suppression law, including the repeal of early voting, repeal of same day registration and out of precinct voting, alleging violations of the U.S. Constitution and the Voting Rights Act of 1965.

2013 – present – *Currie v. State of North Carolina*

-Case No. 13-CVS-1419 (Orange County Superior Court, North Carolina)

-counsel for plaintiffs challenging the state's voter ID law, alleging violations of the state constitution.

2013 – present – *Wright v. North Carolina*

-Case No. 5:13-cv-607 (E.D.N.C.)

-counsel for plaintiffs challenging a local bill restructuring the Wake County Board of Education, alleging violations of the Equal Protection Clause.

2011- present - *Perez v. Perry*

-Case No. 5:11-cv-00360 (W.D. Tx)

-counsel for Plaintiffs Texas State Conference of NAACP Branches, arguing that the enacted 2011 plans for Congress and State House in Texas violated Section 2 of the Voting Rights Act and the equal protections of the Fourteenth Amendment.

2011- present – *Dickson, et al. v. Rucho, et al./NC NAACP et al., v. North Carolina, et al.*

-Case Nos. 11-CVS-16896 and 11-CVS-16940 (pending in the North Carolina Supreme Court)
-counsel for plaintiffs, the North Carolina NAACP, other civil rights organizations, and numerous state residents challenging under the federal and state constitutions the 2011 enacted redistricting plans for North Carolina congressional, state house and state senate districts

2015 – 2016 – *Shapiro v. McManus*

-Case No. 14-990 (United States Supreme Court)
-counsel for Amicus Virginia State Conference of NAACP Branches, arguing that a single judge hearing a redistricting case improperly dismissed the case, without referring it to the three-judge panel required by law.

2015 – 2016 – *Personhuballah v. Alcorn*

-Case No. 3:13-cv-00678 (E.D. Va.)
-counsel for Virginia NAACP in submitting plan as a non-party to the special master developing a remedial plan following the invalidation of congressional district invalidated as a racial gerrymander; counsel for Virginia NAACP as amicus in the United States Supreme Court in support of the decision of the court below.

2015 – 2016 – *Harris v. Arizona Independent Redistricting Commission*

-Case No. 14-232 (United States Supreme Court)
-counsel for Amicus Southern Coalition for Social Justice arguing that partisanship should not be allowed to justify redistricting plan population deviations of up to 10%, and highlighting for the Court examples of problems that such an exception would engender.

2014 – *Morton v. State of North Carolina*

-Case No. 14-cv-013294 (Wake County Superior Court, North Carolina)
-counsel for plaintiffs seeking judicial review of an arbitrary and capricious early voting plan for Lincoln County, NC.

2011-2013 - *Texas v. United States*

-Case No. 5:11-cv-001303 (D.D.C.)
-counsel for Defendant-Intervenor Texas State Conference of NAACP Branches, successfully arguing that the enacted 2011 plans for Congress, State House and State Senate in Texas violated Section 5 of the Voting Rights Act.

2012-2013 - *Shelby County, Alabama v. Holder*

-570 U.S. _____, 2013 U.S. LEXIS 4917 (United States Supreme Court, June 25, 2013)
-counsel for amicus political science and law professors, detailing for the court the vast amounts of empirical evidence that justify the Section 5 of the Voting Rights Act coverage formula reauthorized by Congress in 2006.

- 2010 – 2012 - *Nix v. Holder*
 -133 S. Ct. 610 (United States Supreme Court, November 13, 2012)
 -counsel for Defendant-Intervenor North Carolina State Conference of NAACP Branches, defending the constitutionality of Section 5 of the Voting Rights Act in the D.D.C. and United States Supreme Court.
- 2012 – *NAACP v. Duplin County, NC*
 -Case No. 88-cv-7 (E.D.N.C.)
 -counsel for plaintiffs NC NAACP and Duplin County NAACP, successfully contesting dilutive modification of a consent decree that was put into place to provide black voters in the county with the opportunity to elect members to the Board of County Commission and Board of Education.
- 2012 – *Holmes v. Lenoir County, NC, Board of Education*
 -Case No. 86-120-cv-4 (E.D.N.C.)
 -counsel for plaintiffs, individual black voters in Lenoir County, NC, successfully contesting dilutive modification of a consent decree that was put into place to provide black voters in the county with the opportunity to elect members to the Board of Education.
- 2012 – *Porter, et al. v. Stewart, et al.*
 -Case No. 5:88-cv-950 (E.D.N.C.)
 -counsel for individual African-American voters in Harnett County, North Carolina, seeking modification of a voting rights consent decree (governing districts to elect members of the Board of County Commissioners and Board of Education) to allow for the continued protection of the voting rights of black voters in the county given population changes
- 2010 – *League of Women Voters v. Rokita*
 -929 N.E.2d 758 (Indiana Supreme Court, June 30, 2010)
 -counsel for amicus civil rights organizations, arguing that the Privileges and Immunities Clause of the Indiana constitution provides protections to voters in Indiana that exceed the protections provided by the federal constitution
- 2010 - 2011 – *Libertarian Party of NC v. North Carolina*
 -365 N.C. 41 (North Carolina Supreme Court, March 11, 2011)
 -counsel for amicus civil rights organizations, highlighting the policy reasons that justify open and easy ballot access for third-party candidates and parties
- 2012 - *Greensboro Branch of the NAACP v. Guilford County, NC, Board of Elections, et al.*
 -Case No. 1:12-cv-111 (M.D.N.C.)
 -counsel for plaintiffs Greensboro Branch of the NAACP and individual voters, successfully challenging on equal protection grounds a redistricting plan for the Guilford County Board of County Commissioners that would have effectively deprived a swath of county citizens of any representation for two years
- 2012 – *In re: 2012 Joint Resolution of Legislative Apportionment*
 -Case No. SC12-460, 89 So. 3d 872 (Florida Supreme Court, April 27, 2012)

-counsel for Florida State Conference of NAACP Branches, opposing on state constitutional grounds the state's enacted redistricting plan for the State Senate and arguing in front of the Florida Supreme Court

2012 – 2015 – *Romo, et al. v. Detzner, et al.*

-Case Nos. 2012-CA-000412 and 2012-CA-000490 (Leon County, FL, Circuit Court)

-counsel for Defendant-Intervenor Florida State Conference of NAACP Branches, defending against state constitutional challenge a district which enables black voters in north-central Florida to elect their candidate of choice to U.S. Congress

2012 - 2014 - *Moore, et al. v. Haslam, et al.*,

-Tennessee Court of Appeals No. M2013-00811-COA-R3-CV

-counsel for plaintiffs, residents of Shelby County, TN, challenging under state constitution the Tennessee state senate redistricting plan enacted in 2011

Publications

Allison J. Riggs, *Felony Disenfranchisement in Florida: Past, Present and Future*, 28 ST. JOHN'S J. C.R. & ECON. DEV. 111 (2015).

Allison J. Riggs & Jack E. Riggs, *Epilepsy's Role in the Historical Differentiation of Religion, Magic, and Science*, 46 EPILEPSIA 452 (2005).

Allison J. Riggs & Jack E. Riggs, "Guessing It Right", John A. Simpson, and Myasthenia Gravis: the Role of Analogy in Science. 62 NEUROLOGY 465 (2004).

Allison J. Riggs, RJ Millechia & Jack E. Riggs, *The Contributions of Lavoisier, Carnot, and Mayer to Understanding Heat Illness*, 75 AVIATION, SPACE, AND ENVIRONMENTAL MEDICINE 916 (2004).

Jack E. Riggs & Allison J. Riggs, *Prominent 59-year-old British neurosurgeon, Victor Horsley, succumbs to heatstroke while serving with allied troops in Iraq*, 18 BRITISH JOURNAL OF NEUROSURGERY 375 (2004).

National and/or Notable Invited Voting Rights Presentations

2015 – NAACP Legal Defense & Education Fund, Inc., (LDF) Annual Civil Rights Training Institute

-panelist, "A Change is Gonna Come: Advocating to Preserve and Advance the Right to Vote"

-Airlie Conference Center, Warrenton, VA

-October 23, 2015

2015 – Voto Latino Power Summit

-panelist, "Battle of the Ballot: Latinos and the Fight for Voting Rights"

-Charlotte, NC

-September 29, 2015

- 2012 - Congressional Black Caucus Institute
 - panelist: “Post Reconstruction 2012: Voter Suppression/I.D. Laws”
 - Tunica, MS
 - August 11, 2012

- 2011 - Congressional Black Caucus Institute
 - panelist: “Redistricting: Reapportioning and other Barriers to Participation – Having a Seat at the Table”
 - Tunica, MS
 - August 13, 2011

- 2014 – NAACP National Convention CLE
 - panelist: “Voter Suppression after the Shelby Decision”
 - Las Vegas, NV
 - July 2014

- 2013 - NAACP National Convention CLE
 - panelist: “Voting Rights After the Shelby Decision”
 - Orlando, FL
 - July 14, 2013

- 2012 - Hispanic National Bar Association
 - panelist: “Voting Rights and Voter Suppression Efforts”
 - Seattle, WA
 - August 23, 2012

- 2013 - Federalist Society event (voter ID)
 - panelist: “Voter ID in North Carolina,” with Hans Von Spakovsky, John Fund and Bob Hall
 - Raleigh, NC
 - February 6, 2013

- 2013 - Federalist Society event (Shelby County)
 - debater: “The Voting Rights Act and the Shelby County Case” with Roger Clegg
 - Durham, NC
 - March 26, 2013

- 2013 – North Carolina State House of Representatives Elections Committee
 - invited testimony: Invited Views on House Bill 589 (Voter Photo ID Requirement)
 - Raleigh, NC
 - March 13, 2013

- 2011 - Young Elected Officials Network National Convening
 - panelist: “Voting Reform and Redistricting: Meeting the Needs of an Increasingly Mobile Electorate and Protecting Communities of Interest”
 - Washington, D.C.
 - June 4, 2011

2010- Young Elected Officials Network Policy Academy: Redistricting and Immigration
-panelist: “In-Depth Redistricting Overview”
-Los Angeles, CA
-September 10, 2010

2010- Young Elected Officials Network National Convening
-panelist: “Redistricting for Fair Representation”
-Washington, D.C.
-May 15, 2010

2012 - Paul C. Perkins Bar Association
-presenter: “Election Protection and Voting Rights”
-Orlando, FL
-October 4, 2012

Exemplar National Media Work - Voting Rights

July 3, 2013, The Alan Colmes Show, Fox News Radio

July 2013 – Tell Me More, NPR

July 29, 2013 – The Rachel Maddow Show, MSNBC

June 30, 2013 – “Changes Loom for N.C. Electorate,” L.A. Times interview

August 12, 2014 – The Ed Show, MSNBC

February 12, 2016 – To the Point, NPR

May 1, 2016 – Politics Nation, MSNBC

Awards

July 2013 - National NAACP Legal Department – 2013 Foot Soldier Award

EXHIBIT D

EDUCATION

University of Florida, Fredric G. Levin College of Law

GPA: 3.63

Juris Doctor, cum laude

May 2010

- Top 12% of graduating class
- Florida Moot Court: *Board Member*; Journal of Law and Public Policy: *Executive Articles Editor*
- Book Awards: Juvenile Justice Law, Poverty Law
- Thesis: *The Death Penalty and Deterrence: An Inevitable Relationship with an Uncertain Effect*

University of Massachusetts Amherst, Isenberg School of Management

GPA: 3.96

B.S. Sport Management, B.A. Spanish, Commonwealth Honors College, summa cum laude

May 2007

- Valedictorian for primary major

ADMISSIONS

- **North Carolina Bar**, admitted August 2011; **Florida Bar**, admitted September 2010
- Eastern District of North Carolina, Middle District and Southern District of Florida Federal Courts
- United States Supreme Court

EXPERIENCE

United States Department of Justice, Civil Rights Division, Voting Section

August 2016 – present

Trial Attorney

Southern Coalition for Social Justice, Durham NC

August 2014-July 2016

Staff Attorney, Voting Rights

- Draft motions and briefs in complex voting rights cases
- Conduct depositions and participate in trial in numerous voting rights cases

Cranfill Sumner & Hartzog LLP, Raleigh, NC

March 2012-August 2014

Associate in litigation defense group for one of North Carolina's largest law firms

- Represent municipalities, school districts, individuals, and corporations in North Carolina federal and state courts regarding professional liability, business law, employment, and negligence claims.
- Compose and argue regularly at dispositive motion and pre-trial hearings.
- Draft complex legal documents including constitutional briefs and termination agreements.

Macfarlane, Ferguson & McMullen, Tampa, FL

Sept. 2010-Feb. 2012

Associate in litigation group for Tampa's oldest law firm

- Provided legal counsel to individuals, corporations, and non-profit organizations in commercial litigation, criminal, civil rights, and appellate areas.
- Assisted in all aspects of litigation process including client interviews, discovery, witness depositions, motion drafting and argument, and trial.
- Drafted pleadings and briefs including criminal First Amendment appeal and bankruptcy appeal.

Public Defender Clinic, University of Florida, Gainesville, FL

Aug. 2009-Dec. 2009

Certified Legal Intern for 8th Circuit – Office of the Public Defender, State of Florida

- Represented indigent defendants in all phases of criminal cases in the state of Florida.

Southern Legal Counsel, Gainesville, FL

Aug. 2009-May 2010

Center for Governmental Responsibility Public Service Fellow for public interest law firm

- Researched and wrote memorandums to support non-profit organization in federal civil rights claims under Individuals with Disabilities Education Act, 42 U.S.C. 1983, and Fair Housing Act.

UNC School of Government, Chapel Hill, NC

June 2009-Aug. 2009

Law Clerk for largest university-based local government research institute in the U.S.

- Drafted training materials for NC public defenders in pre-trial release and domestic violence cases.
- Composed education law article regarding implications of student searches in NC public schools.

U.S. Department of Justice, United States Attorney's Office

June 2008-Aug. 2008

4432 Manns Chapel Rd. Chapel Hill, NC 27516
P: 508-654-6888 | E: geppstei@gmail.com

Extern for the Middle District of Florida, Ft. Myers, FL.

- Drafted motions in limine and legal research memorandums for federal criminal actions.

PRO BONO

- Co-counsel with the Southern Coalition for Social Justice in election law claim.
- Member of the Legal Committee for the ACLU of North Carolina to advise Legal Director regarding current litigation and to approve engagement in statewide criminal and civil litigation.

EXHIBIT E

Emily E. Seawell

810 W. Bessemer Ave. • Greensboro, N.C. 27408
eseawell@gmail.com • 336-740-4780

LEGAL WORK EXPERIENCE

Southern Coalition for Social Justice, Durham, North Carolina

Staff Attorney, February 2016 to present

- Engage in a full caseload of voting-related civil litigation and appeals in state and federal court; conduct legal and non-legal research; draft court documents and manage client relationships in legislative and legal matters involving redistricting, election administration, and the right to vote; address and respond to research requests from elected officials and community leaders on social justice-related topics; draft public communications; manage assignments for legal interns

Postgraduate Legal Fellow, May 2015 to February 2016

- Continued to provide full-time litigation support in voting rights cases, including conducting legal research, drafting court documents, and assisting in preparations for depositions, hearings, and trials; continued to engage with clients, elected officials, and the community on social justice-related topics; continued to track civil rights legislation

Legal Extern in Residence, January 2015 to May 2015

- Provided full-time litigation support in voting rights cases, including conducting legal research, drafting court documents, and assisting in preparations for depositions, hearings, and trials; engaged with clients, elected officials, and the community on social justice-related topics; tracked civil rights legislation

Humanitarian Immigration Law Clinic, Greensboro, North Carolina

Student Attorney, August 2014 to December 2014

- Interviewed prospective clients with humanitarian and immigration-related needs; managed case construction, conducted a comprehensive deposition, and drafted an affidavit and brief in support of an individual application for asylum; researched country conditions for inclusion in asylum applications; represented pro bono clients in federal administrative hearings before United States immigration officers

Elon University School of Law, Greensboro, North Carolina

Research Assistant to Patricia Carole Perkins, May 2013 to May 2015

- Conducted research and prepared class materials on best practices in legal writing and communication; prepared curricula and reports on best practices in leadership education and experiential education

Atlantic Coast Conference, Greensboro, North Carolina

Intern for Football Game Day Operations, Multimedia, and Legal Affairs, Fall 2013 and Fall 2014

- Drafted and reviewed contract provisions for corporate and media partnerships; assisted in enforcement of media and university contracts; assisted in football operations and game-day implementation of NCAA regulations and corporate partnerships

North Carolina Supreme Court, Raleigh, North Carolina

Judicial Extern for the Honorable Paul M. Newby, January 2014 to May 2014

- Researched and wrote legal memoranda on petitions for discretionary review before the North Carolina Supreme Court; assisted in briefing justice and other preparations for oral arguments before the court

North Carolina Administrative Office of the Courts, Raleigh, North Carolina

Extern for Legal and Legislative Services, Summer 2013

- Conducted extensive statutory research to create fiscal impact and court cost reference guides for use by judicial and legislative branch employees

Emily E. Seawell

810 W. Bessemer Ave. • Greensboro, N.C. 27408
eseawell@gmail.com • 336-740-4780

OTHER POSTGRADUATE WORK EXPERIENCE

AOL, Inc. / Patch, Tampa, Florida

Associate Regional Editor - Florida, May 2011 to June 2012

- Managed a network of community websites, employees, and contractors in the Tampa Bay area with a focus on editing, community relations, and user engagement; created and implemented regional strategies for improving readership rates, revenue, and efficiency; developed business and marketing partnerships with community leaders; worked collaboratively with sales and marketing managers to raise the company's local profile; wrote a regional business plan that won the national best in company award

Media General, Inc. (The Tampa Tribune, WFLA-TV, and TBO.com), Tampa, Florida

Multimedia Editor, November 2005 to May 2011

- Oversaw production of features and other advance content for newspapers in three metropolitan markets; led negotiations among senior managers in three states to create a universal code of professional standards; trained newsroom editors on online news production and print pagination systems; edited news, sports, and features articles for publication in print and online; planned, created, and edited multimedia projects for The Tampa Tribune and TBO.com, including designing web pages, editing HTML and CSS, and shooting and editing photos and videos; drafted multimedia and workflow strategies as a member of newsroom interactivity and social media strategy teams; was twice named employee of the month for collaboration

Lexington Herald-Leader, Lexington, Kentucky

Dow Jones National Honors Program Editing Intern, May 2005 to October 2005

- Edited news and features packages for factual and stylistic accuracy on daily deadline; wrote headlines, photo captions, and other display type aimed at concisely and effectively engaging and informing readers

EDUCATION

Elon University School of Law, Greensboro, North Carolina

Juris Doctor, May 2015

- Dean's Scholar; Leadership Fellow; ALI-CLE Award for Exemplary Scholarship and Leadership; NCBA Certificate for Commitment to Pro Bono Service; Editorial Board, *Elon Law Review*; Chair, Student Mentor Program; Chair, Elon Law Leadership Academy; Book Award, Legal Method & Communication; Book Award, Professional Responsibility; Presenter and Contributing Author, New York Law School *Symposium on Twenty Years of South African Constitutionalism*

University of Florida, Gainesville, Florida

Bachelor of Science in Journalism, April 2005

- Honors Program; National Merit Scholar; Managing Editor, *The Independent Florida Alligator* newspaper

SPEAKING ENGAGEMENTS

Appalachian State University, Boone, N.C., September 2016

- Spoke about the status of lawsuits challenging House Bill 589 and its implications for voters

Florida Public Relations Association, Tampa Bay chapter, July 2016

- Spoke on best practices in communication and community outreach on controversial legal issues

League of Women Voters of North Carolina, statewide conference, April 2016

- Spoke on best practices in legislative and local government advocacy and community engagement

Concerned Citizens of Northeast Greensboro, N.C., April 2016

- Spoke on legal and practical implications of House Bill 2 for communities of color

Citizens for Economic and Environmental Justice, Greensboro, N.C., August 2015

- Spoke on legal and practical implications of a redistricting plan for the Greensboro City Council

EXHIBIT F

Southern Coalition for Social Justice - *Wright/RWCA* - Attorneys' Fees Summary**Billable Time***Wright Case Only*

| Timekeeper | Position | Hours | Hourly Rate | Total Amount Billed |
|---------------------|---------------------------|--------------|--------------------|----------------------------|
| Anita Earls | Executive Director | 264.68 | \$ 550.00 | \$ 145,574.00 |
| Allison Riggs | Senior Attorney | 66.02 | \$ 400.00 | \$ 26,408.00 |
| Christopher Ketchie | Policy Analyst | 67.25 | \$ 225.00 | \$ 15,131.25 |
| Emily Seawell | Legal Fellow (unlicensed) | 11.4 | \$ 200.00 | \$ 2,280.00 |
| Jeremy Collins | Legal Fellow (unlicensed) | 21.75 | \$ 200.00 | \$ 4,350.00 |
| Christopher Heaney | Legal Fellow (licensed) | 5.36 | \$ 250.00 | \$ 1,340.00 |

TOTAL - Wright only 436.46 \$ 195,083.25

RWCA Case Only

| Timekeeper | Position | Hours | Hourly Rate | Total Amount Billed |
|-------------------|---------------------------|--------------|--------------------|----------------------------|
| Anita Earls | Executive Director | 47.85 | \$ 550 | \$ 26,317.50 |
| Emily Seawell | Legal Fellow (unlicensed) | 6.58 | \$ 200 | \$ 1,316.00 |
| Joseph Crupi | Legal Intern (unlicensed) | 8.25 | \$ 150 | \$ 1,237.50 |

TOTAL - RWCA only 62.68 \$ 28,871.00

RWCA/Wright - Consolidated

| Timekeeper | Position | Hours | Hourly Rate | Total Amount Billed |
|---------------------|---------------------------------|--------------|--------------------|----------------------------|
| Anita Earls | Executive Director | 390.8 | \$ 550.00 | \$ 214,940.00 |
| Allison Riggs | Senior Attorney | 389.11 | \$ 400.00 | \$ 155,644.00 |
| George Eppsteiner | Staff Attorney | 110.3 | \$ 300.00 | \$ 33,090.00 |
| Emily Seawell | Staff Attorney (post-licensure) | 145.74 | \$ 250.00 | \$ 36,435.00 |
| Emily Seawell | Legal Fellow (unlicensed) | 175.89 | \$ 200.00 | \$ 35,178.00 |
| Christopher Ketchie | Policy Analyst | 23 | \$ 225.00 | \$ 5,175.00 |
| Dr. Fred McBride | Senior Policy Analyst | 108.2 | \$ 225.00 | \$ 24,345.00 |
| Jaclyn Maffetore | Legal Extern (unlicensed) | 44.3 | \$ 150.00 | \$ 6,645.00 |

TOTAL - Consolidated cases **1387.34** **\$ 511,452.00**

Total Billable Amount \$ 735,406.25

Less 10% Reduction of Hours in RWCA for Unsuccessful Claim **(\$54,032.30)**

Total Amount Claimed \$ 681,373.95

Anita Earls - Time Records**Wright v. State of North Carolina ONLY**

| Date | Timekeeper | Hours | Task | Description |
|-----------|------------------|-------|----------------------------|-------------------------------------------------------------|
| 3/20/2013 | Earls, Anita Sue | 0.3 | Telephone Call - Clier Tf. | Yevonne Brannon |
| 3/20/2013 | Earls, Anita Sue | 1 | Review | district data, impact of S325, analyze plan comparisons |
| 3/21/2013 | Earls, Anita Sue | 0.4 | Telephone Call - Clier Tt. | Yevonne Brannon |
| 3/21/2013 | Earls, Anita Sue | 0.5 | Research | potential legal theories |
| 3/21/2013 | Earls, Anita Sue | 0.25 | Conf. | w/Allison re: potential claim |
| 3/21/2013 | Earls, Anita Sue | 0.5 | Review | precincts in proposed new districts |
| 3/21/2013 | Earls, Anita Sue | 0.25 | Conf. | w/Jeremy re: meeting with clients |
| 3/21/2013 | Earls, Anita Sue | 0.25 | email to | Client re: analysis of districts |
| 3/25/2013 | Earls, Anita Sue | 0.4 | Edit | Letter for public hearing |
| 3/25/2013 | Earls, Anita Sue | 0.8 | Edit | Public hearing letter |
| 3/25/2013 | Earls, Anita Sue | 3.5 | Appear at Hearing | Attend public hearing for Wake Delegation |
| 3/25/2013 | Earls, Anita Sue | 0.3 | Conf. | w/clients re: potential next steps |
| 3/27/2013 | Earls, Anita Sue | 0.25 | email to | clients re: potentially impacted areas |
| 3/27/2013 | Earls, Anita Sue | 0.8 | Research | media coverage of rationales for the plan |
| 3/27/2013 | Earls, Anita Sue | 0.5 | Review | existing research on disparities in Wake Co. pub. Schools |
| 3/27/2013 | Earls, Anita Sue | 0.25 | Research | impacted precincts compared to student attendance zones |
| 3/27/2013 | Earls, Anita Sue | 0.3 | Conf. | w/Jeremy re: legislative process & advocacy options |
| 3/28/2013 | Earls, Anita Sue | 0.2 | email to | clients re: legislative and litigation options |
| 4/2/2013 | Earls, Anita Sue | 0.4 | draft | retainer agreement |
| 4/2/2013 | Earls, Anita Sue | 1.7 | Mtg | in Raleigh with potential plaintiffs |
| 4/4/2013 | Earls, Anita Sue | 2.5 | draft | initial complaint |
| 4/4/2013 | Earls, Anita Sue | 0.5 | Telephone Call - Clier Tt. | Yevonne Brannon re plaintiffs and allegations for complaint |
| 4/5/2013 | Earls, Anita Sue | 1.8 | Edit | draft of complaint |
| 4/11/2013 | Earls, Anita Sue | 0.25 | email to | Yevonne Brannon re: status of bill |
| 4/16/2013 | Earls, Anita Sue | 0.3 | Telephone Call - Clier | Telephone call from Calla Wright |
| 4/18/2013 | Earls, Anita Sue | 0.2 | email to | Yevonne Brannon re: school board resolution |
| 4/24/2013 | Earls, Anita Sue | 0.2 | email from | clients re: school board resolution |
| 4/25/2013 | Earls, Anita Sue | 0.25 | Review | copy of school board resolution |
| 5/3/2013 | Earls, Anita Sue | 0.5 | Conf. | with Chris Ketchie re: possible analysis of districts |
| 5/6/2013 | Earls, Anita Sue | 0.2 | email | to client re: analysis of district plan alternatives |
| 5/6/2013 | Earls, Anita Sue | 0.25 | Conf. | with Allison re: legal claims |
| 5/7/2013 | Earls, Anita Sue | 0.5 | Conf. | with Chris Ketchie re: partisan evaluation of deviations |
| 5/8/2013 | Earls, Anita Sue | 0.4 | Conf. | w/Chris Ketchie re: results of data analysis |

| | | |
|-----------------------------|--------------------------------|------------------------------------------------------------------------|
| 6/7/2013 Earls, Anita Sue | 0.5 Conf. | w/Chris Ketchie re: impact of population changes; data from Dan Frey |
| 6/8/2013 Earls, Anita Sue | 0.7 review | Stam amendment changes |
| 6/10/2013 Earls, Anita Sue | 0.25 Conf. | w/Chris Ketchie re: analysis of partisan impact |
| 6/12/2013 Earls, Anita Sue | 0.5 Telephone Call - Clier | Telephone call with clients re: impact of stam amendments |
| 6/13/2013 Earls, Anita Sue | 0.8 Research | Potential claims |
| 6/17/2013 Earls, Anita Sue | 0.75 Conf. | w/Allison re: revising draft complaint |
| 6/19/2013 Earls, Anita Sue | 0.5 Conf. | w/Chris Ketchie re data required from General Assembly |
| 6/20/2013 Earls, Anita Sue | 0.8 Conf. | w/Allison & Chris re: impact of new districts |
| 6/21/2013 Earls, Anita Sue | 2 Mtg | w/Clients re: litigation requirements |
| 6/27/2013 Earls, Anita Sue | 0.5 Conf. | w/Chris Ketchie re: results of his analysis |
| 7/9/2013 Earls, Anita Sue | 0.2 Conf. | w/Allison re: data needed for complaint |
| 7/23/2013 Earls, Anita Sue | 0.3 Telephone Call - Clier Tf. | Yevonne Brannon re: preparing complaint |
| 7/24/2013 Earls, Anita Sue | 0.5 Telephone Call - Clier Tt. | Calla Wright, Earl Johnson |
| 8/5/2013 Earls, Anita Sue | 0.3 Conf. | w/Jeremy re: contacting clients |
| 8/6/2013 Earls, Anita Sue | 0.25 Conf. | w/Jeremy re: progress obtaining retainer agreements |
| 8/12/2013 Earls, Anita Sue | 1 Review | draft complaint |
| 8/12/2013 Earls, Anita Sue | 0.3 Conf. | w/Allison Riggs re: edits to complaint |
| 8/13/2013 Earls, Anita Sue | 0.35 Email | from Amy Womble re: residency issues, research and prepare response |
| 8/14/2013 Earls, Anita Sue | 0.8 Edit | complaint |
| 8/20/2013 Earls, Anita Sue | 1.2 Conf. | Conference call with plaintiffs re: filing complaint & litigation plan |
| 8/20/2013 Earls, Anita Sue | 0.5 Email | to clients with draft of complaint |
| 8/21/2013 Earls, Anita Sue | 0.8 Review | Client comments on draft complaint |
| 8/21/2013 Earls, Anita Sue | 0.75 draft | email outlining expected litigation budget |
| 8/22/2013 Earls, Anita Sue | 1 Review | final draft of complaint |
| 8/26/2013 Earls, Anita Sue | 0.5 Review | Summonses issued by court |
| 8/29/2013 Earls, Anita Sue | 1 Prepare | materials for service |
| 9/4/2013 Earls, Anita Sue | 0.5 Review | requirements for service |
| 9/5/2013 Earls, Anita Sue | 0.25 Email | to clients re: next steps |
| 9/25/2013 Earls, Anita Sue | 1 Review | recent court filings & order assigning magistrate |
| 10/23/2013 Earls, Anita Sue | 0.5 Review | and respond to Email from Allison re: update on Status of case |
| 11/1/2013 Earls, Anita Sue | 0.5 File | Waiver of service documents |
| 11/4/2013 Earls, Anita Sue | 1 Review | Motion to Dismiss and Answer |
| 11/5/2013 Earls, Anita Sue | 0.25 Review | Order for Discovery Plan |
| 11/13/2013 Earls, Anita Sue | 4.6 Research | Grounds for motion to dismiss, sovereign immunity issues |
| 11/13/2013 Earls, Anita Sue | 2 Draft | Amended Complaint |
| 11/15/2013 Earls, Anita Sue | 3.2 Research | motion to amend |

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| 11/15/2013 Earls, Anita Sue | 1.5 draft | Motion to amend complaint & draft Order |
| 11/15/2013 Earls, Anita Sue | 0.3 Email | to clients re: motion to dismiss and response |
| 11/19/2013 Earls, Anita Sue | 7.5 draft | Memorandum in support of mot to amend |
| 11/19/2013 Earls, Anita Sue | 0.5 File | Motion for leave to file amended complaint and amended complt |
| 11/22/2013 Earls, Anita Sue | 11.5 Research | and draft memorandum opposing motion to dismiss |
| 11/23/2013 Earls, Anita Sue | 2.5 Edit | and file memorandum opposing motion to dismiss |
| 12/4/2013 Earls, Anita Sue | 0.2 email | to clients update on status of case |
| 2/21/2014 Earls, Anita Sue | 0.25 review | notice of hearing |
| 2/23/2014 Earls, Anita Sue | 0.2 email | to Allison re: covering hearing |
| 2/23/2014 Earls, Anita Sue | 0.25 email | to law school cancelling panel presentation because of Wright hearing |
| 2/23/2014 Earls, Anita Sue | 0.2 email | to clients re: hearing on motion to amend |
| 2/24/2016 Earls, Anita Sue | 0.3 email | to clients explaining purpose of hearing & responding to questions |
| 2/24/2014 Earls, Anita Sue | 1.75 Prepare | for argument on motion |
| 2/25/2014 Earls, Anita Sue | 0.3 email | to clients re: hearing in Elizabeth City |
| 2/26/2014 Earls, Anita Sue | 2.5 Prepare | for hearing |
| 2/27/2014 Earls, Anita Sue | 6.5 Travel | to and from Elizabeth City for Hearing on Motion to Dismiss |
| 2/27/2014 Earls, Anita Sue | 1.5 Appear at Hearing | Hearing on Motion for leave to file amended complaint |
| 2/27/2014 Earls, Anita Sue | 0.35 Telephone Call - Clier tt. | Yevonne Brannon and Calla Wright re: hearing on motions |
| 2/27/2014 Earls, Anita Sue | 0.25 Conf. | w/opposing counsel re: possible discovery schedule |
| 3/17/2014 Earls, Anita Sue | 1.5 Review | Order granting motion to dismiss |
| 3/17/2014 Earls, Anita Sue | 0.5 Telephone Call - Clier | telephone calls to clients re: dismissal of case |
| 3/17/2014 Earls, Anita Sue | 0.3 Emails | responding to inquiries regarding dismissal of claims |
| 3/17/2014 Earls, Anita Sue | 0.5 Conf. | with Allison re: appeal |
| 3/18/2014 Earls, Anita Sue | 0.3 email | to clients re: dismissal of case, next steps |
| 3/19/2014 Earls, Anita Sue | 0.4 Telephone Call - Clier Tf. | Clients re possible appeal |
| 3/27/2014 Earls, Anita Sue | 0.5 Email | to clients with doodle poll to set up meeting re: appeal |
| 3/28/2014 Earls, Anita Sue | 3.5 Research | re: grounds for appeal |
| 3/28/2014 Earls, Anita Sue | 0.2 Email | to clients with details of meeting |
| 3/29/2014 Earls, Anita Sue | 0.1 Email | to Allison re: appeal |
| 3/31/2014 Earls, Anita Sue | 0.1 Email | reminder to clients re: meeting |
| 4/1/2014 Earls, Anita Sue | 0.5 Email | mutiple emails to clients to set up meeting on appeal |
| 4/2/2014 Earls, Anita Sue | 1.5 Meeting | with clients to discuss appeal |
| 4/7/2014 Earls, Anita Sue | 0.65 draft | and file notice of appeal |
| 4/7/2014 Earls, Anita Sue | 0.2 email | to Shannah re: posing notice of appeal |
| 4/7/2014 Earls, Anita Sue | 0.2 email | to Allison re: assistance with appeal |
| 4/8/2014 Earls, Anita Sue | 0.25 Email | to client explaining rationale for appeal |

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| 4/9/2014 Earls, Anita Sue | 0.3 Review | docketing notice |
| 4/9/2014 Earls, Anita Sue | 0.45 draft | and file notice of appearance |
| 4/10/2014 Earls, Anita Sue | 0.25 Review | appeal deadlines |
| 4/15/2014 Earls, Anita Sue | 0.2 Email | to Chris Heaney re: docs needed for appeal |
| 4/15/2014 Earls, Anita Sue | 4.5 Research | legal grounds for appeal on merits of claim |
| 4/16/2014 Earls, Anita Sue | 2.75 draft | and file corporate disclosure statements and docketing statement |
| 4/16/2014 Earls, Anita Sue | 1.25 Research | qualified immunity issues for appeal |
| 4/16/2014 Earls, Anita Sue | 1.6 Draft | proposed joint appendix |
| 4/16/2014 Earls, Anita Sue | 0.5 Email | with letter to opposing counsel re: joint appendix |
| 4/16/2014 Earls, Anita Sue | 0.3 Draft | letter to opposing counsel serving filed documents |
| 4/30/2014 Earls, Anita Sue | 0.3 Review | emails from opposing counsel re: joint appendix and respond |
| 4/30/2014 Earls, Anita Sue | 0.8 draft | correction to docketing statement and file |
| 5/12/2014 Earls, Anita Sue | 1.25 Research | partisan gerrymander cases |
| 5/13/2014 Earls, Anita Sue | 2.5 Research | one-person, one-vote claims, basis for expansion of law |
| 5/13/2014 Earls, Anita Sue | 0.75 Emails | from printer re: joint appendix, compile joint appendix |
| 5/14/2014 Earls, Anita Sue | 2.5 Research | significance of summary affirmance, legal issues for appeal |
| 5/18/2014 Earls, Anita Sue | 4.3 draft | 4th circuit brief statement of facts |
| 5/19/2014 Earls, Anita Sue | 12.5 draft | brief and legal research for brief |
| 5/19/2014 Earls, Anita Sue | 0.25 email | to Chris Heaney with copy of joint appendix |
| 5/20/2014 Earls, Anita Sue | 7.4 draft | brief and email to printer |
| 5/20/2014 Earls, Anita Sue | 0.35 Conf. | with Allison re: brief |
| 5/20/2014 Earls, Anita Sue | 0.3 Email | to law professor with draft of brief seeking input |
| 5/20/2014 Earls, Anita Sue | 0.2 Email | to client re:draft of brief |
| 5/20/2014 Earls, Anita Sue | 3.25 Edit | draft brief & incorporate changes |
| 5/20/2014 Earls, Anita Sue | 0.5 Emails | to printer with revisions to brief |
| 5/21/2014 Earls, Anita Sue | 2.5 Review | printer's draft of brief |
| 5/21/2014 Earls, Anita Sue | 0.2 Email | to Chris Heaney re: draft of brief |
| 5/21/2014 Earls, Anita Sue | 0.2 Email | to clients with final brief |
| 7/2/2014 Earls, Anita Sue | 0.5 Review | Appellees brief |
| 7/2/2014 Earls, Anita Sue | 0.2 email | to clients with copy of appellees brief |
| 7/8/2014 Earls, Anita Sue | 0.25 email | to printer to establish deadlines for reply brief |
| 7/11/2014 Earls, Anita Sue | 5.2 Research | cases cited by Appellees |
| 7/11/2014 Earls, Anita Sue | 0.5 Conf. | with Allison re: strategy for reply brief |
| 7/12/2014 Earls, Anita Sue | 7.25 Research | and draft reply brief |
| 7/14/2014 Earls, Anita Sue | 0.1 Email | responding to question regarding status of case |
| 7/14/2014 Earls, Anita Sue | 0.25 Email | to Shelvvia and Jeremy re: assistance needed |

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| 7/14/2014 Earls, Anita Sue | 5.5 draft | reply brief |
| 7/15/2014 Earls, Anita Sue | 4.75 draft | reply brief |
| 7/15/2014 Earls, Anita Sue | 0.25 Review | cases from Chris Heaney & Email from Jeremy Collins |
| 7/16/2014 Earls, Anita Sue | 8.5 draft | & edit reply brief, review printers' proofs, emails to printer |
| 9/5/2014 Earls, Anita Sue | 1.33 Review | court calendar and email to clients with briefs |
| 9/15/2014 Earls, Anita Sue | 0.4 Review | emails from Alec Peters re: counsel's availability |
| 10/2/2014 Earls, Anita Sue | 0.25 draft | and file oral argument acknowledgement form |
| 10/14/2014 Earls, Anita Sue | 0.5 Emails | to and from clients re: significance of oral argument |
| 10/16/2014 Earls, Anita Sue | 1 Meeting | with clients re: potential remedial issues |
| 10/27/2014 Earls, Anita Sue | 1 Telephone Call - Clier | telephone from Calla Wright & emails to Yevonne Brannon |
| 11/19/2014 Earls, Anita Sue | 0.5 Conf. | with Allison re: preparing for oral argument |
| 11/25/2014 Earls, Anita Sue | 0.25 Conf. | with Allison regarding case notebooks and oral arg. prep |
| 11/25/2014 Earls, Anita Sue | 0.2 Email | to clients re: plans for oral argument prep. |
| 12/1/2014 Earls, Anita Sue | 0.2 email to | Allison re: possible judges for practice argument |
| 12/2/2014 Earls, Anita Sue | 1 Prepare | for oral argument |
| 12/3/2014 Earls, Anita Sue | 0.75 Conf Call | w/Kareem re: prep. for oral argument |
| 12/3/2014 Earls, Anita Sue | 0.1 Email | to Allison re: oral argument prep. |
| 12/4/2014 Earls, Anita Sue | 0.5 email to | clients re: facts relating to oral argument |
| 12/4/2014 Earls, Anita Sue | 2 Prepare | for oral argument including practice argument |
| 12/5/2014 Earls, Anita Sue | 4.25 Prepare | for 4th Cir. oral argument including practice argument |
| 12/6/2014 Earls, Anita Sue | 1 Prepare | for oral argument |
| 12/8/2014 Earls, Anita Sue | 2.25 Prepare | for oral argument |
| 12/9/2014 Earls, Anita Sue | 3.2 Travel | to Richmond |
| 12/9/2014 Earls, Anita Sue | 2 Attend | oral arguments in 4th circuit to observe |
| 12/9/2014 Earls, Anita Sue | 11 Prepare | for oral argument |
| 12/10/2014 Earls, Anita Sue | 3 Appear at Hearing | to argue appeal in 4th circuit |
| 12/10/2014 Earls, Anita Sue | 2 Travel | to Washington, DC for presentation on case theory |
| 12/15/2014 Earls, Anita Sue | 0.5 Conf. | with Allison to review oral argument |
| 5/27/2015 Earls, Anita Sue | 1 Review | 4th Circuit opinion |
| 5/27/2015 Earls, Anita Sue | 0.5 Review | emails re: 4th circuit decision |
| 6/1/2015 Earls, Anita Sue | 1.5 draft | email to clients explaining opinion and next steps |
| 6/2/2015 Earls, Anita Sue | 1 Email | from clients and responding to clients' questions about ruling |
| 6/8/2015 Earls, Anita Sue | 0.25 Email | correspondance with opposing counsel re: withdrawal |
| 6/10/2015 Earls, Anita Sue | 0.5 Review | court filings re: defendants' representation |
| 6/10/2015 Earls, Anita Sue | 1.5 Review | Defendants' petition for rehearing and emails to co-counsel and clients re: same |
| 6/17/2015 Earls, Anita Sue | 0.75 Review | court order requiring response to petition for rehearing |

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| 6/17/2015 Earls, Anita Sue | 0.25 email | to Allison and George re: response required |
| 6/17/2015 Earls, Anita Sue | 0.2 email | to clients with update on case status |
| 6/25/2015 Earls, Anita Sue | 1.5 Meeting | with clients to answer questions re: status of case |
| 6/26/2015 Earls, Anita Sue | 10.75 Research | re: grounds for rehearing & draft response |
| 6/27/2015 Earls, Anita Sue | 12.2 Draft | Response to Petition for Rehearing |
| 6/29/2015 Earls, Anita Sue | 5.5 Edit | Response to Petition for Rehearing, incorporate comments & file |
| 6/29/2015 Earls, Anita Sue | 0.25 Review | Response to Petition for rehearing filed by AG's office and email to Allison and George |
| 7/15/2015 Earls, Anita Sue | 0.5 Review | Order denying petition for rehearing, email to clients, Allison & Emily |
| 7/16/2015 Earls, Anita Sue | 0.3 Email | denial of rehearing to co-counsel, research rules re: mandate |
| 7/24/2015 Earls, Anita Sue | 0.35 Review | Order reassinging case and email to clients |
| 8/19/2015 Earls, Anita Sue | 0.2 Review | filings re: Defendants' counsel in Wright v. NC |
| TOTAL | 264.68 | |

Anita Earls - Time Records**RWCA v. Wake Co. Bd. of Elections ONLY**

| Date | Timekeeper | Hours | Task | Description |
|-------------|-------------------|--------------|--------------|----------------------------------------------------------------------|
| 3/6/2015 | Earls, Anita Sue | 0.5 | Telephone ca | From client re: proposal to change Wake Co. Commission Districts |
| 3/6/2015 | Earls, Anita Sue | 0.3 | Email | to CK re: analysis needed of proposed Wake Co. Districts |
| 3/6/2015 | Earls, Anita Sue | 1.5 | Review | data regarding proposed district plan and email to clients |
| 3/6/2015 | Earls, Anita Sue | 0.4 | Review | draft legislation S181 |
| 3/6/2015 | Earls, Anita Sue | 0.5 | Review | notes of Senate Redistricting Committee mtg. 3/5 |
| 3/6/2015 | Earls, Anita Sue | 0.75 | Telephone ca | to client re: proposed legislation |
| 3/16/2015 | Earls, Anita Sue | 1.5 | Review | analysis of districts, telephone call to client |
| 3/16/2015 | Earls, Anita Sue | 0.5 | Conf. | with Chris Ketchie re: district maps |
| 3/16/2015 | Earls, Anita Sue | 0.3 | Email | to client explaining analysis of maps |
| 3/17/2015 | Earls, Anita Sue | 0.2 | Email | to CK re: block assignment files |
| 3/21/2015 | Earls, Anita Sue | 0.5 | Draft | individual and organization retainer agreements |
| 3/21/2015 | Earls, Anita Sue | 0.3 | Email | to client with draft retainer agreement |
| 3/23/2015 | Earls, Anita Sue | 0.75 | Review | draft taking points re: potential legislation |
| 3/24/2015 | Earls, Anita Sue | 0.5 | Email | to clients re: impact of existing litigation on legislative proposal |
| 3/24/2015 | Earls, Anita Sue | 0.2 | Review | emails from clients |
| 3/25/2015 | Earls, Anita Sue | 2.5 | Meeting | with potential clients in Raleigh |
| 4/2/2015 | Earls, Anita Sue | 0.5 | Emails | re: setting up meeting with clients |
| 4/6/2015 | Earls, Anita Sue | 1.5 | Review | initial draft complaint |
| 4/7/2015 | Earls, Anita Sue | 1.3 | Meeting | with potential clients in Raleigh |
| 4/7/2015 | Earls, Anita Sue | 2.4 | Research | grounds for racial gerrymander claim |
| 4/8/2015 | Earls, Anita Sue | 0.2 | Email | to follow up with clients |
| 4/8/2015 | Earls, Anita Sue | 0.5 | Email | and conf. w/CK re: analysis needed for one-person, one vote claim |
| 4/8/2015 | Earls, Anita Sue | 0.5 | Review | CK analysis of split precincts for gerrymander claim |
| 4/8/2015 | Earls, Anita Sue | 1.5 | Emails | back and forth with clients re: allegations of complaint |
| 4/8/2015 | Earls, Anita Sue | 5.75 | Draft | complaint |
| 4/9/2015 | Earls, Anita Sue | 6.8 | Revise | draft complaint, draft pleadings, file complaint |
| 4/10/2015 | Earls, Anita Sue | 2.5 | Review | and file financial disclosure statements |
| 4/13/2015 | Earls, Anita Sue | 0.5 | Review | filings and forward to J. Crupi for pleadings file |
| 4/14/2015 | Earls, Anita Sue | 0.3 | email | to clients re: filing |
| 5/5/2015 | Earls, Anita Sue | 0.5 | email | to Alec Peters with complaint & pleadings |
| 5/5/2015 | Earls, Anita Sue | 0.6 | Review | and respond to email from Charles Marshall |
| 5/28/2015 | Earls, Anita Sue | 0.5 | email | to Alec Peters re: dismissal in light of Wright ruling |

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| 5/28/2015 | Earls, Anita Sue | 0.3 | email | to clients re: impact of Wright decision |
| 6/1/2015 | Earls, Anita Sue | 0.5 | Email | and telephone call from Charles Marshall re: extension of time to file answer |
| 6/1/2015 | Earls, Anita Sue | 0.4 | Email | to clients explaining impact of Wright decision |
| 6/2/2015 | Earls, Anita Sue | 0.2 | Email | responding to client question |
| 6/4/2015 | Earls, Anita Sue | 0.5 | Email | to clients regarding next steps |
| 6/4/2015 | Earls, Anita Sue | 0.2 | Email | to Charles Marshall confirming telephone conversation |
| 6/5/2015 | Earls, Anita Sue | 0.35 | Email | to clients with copy of Amended Complaint |
| 6/5/2015 | Earls, Anita Sue | 0.5 | Review | filing of waiver of service |
| 6/5/2015 | Earls, Anita Sue | 0.5 | Draft | notice of voluntary dismissal |
| 6/5/2015 | Earls, Anita Sue | 1.5 | Draft | Amended Complaint |
| 6/5/2015 | Earls, Anita Sue | 0.2 | Review | and file Amended Complaint |
| 6/5/2015 | Earls, Anita Sue | 0.2 | Email | to opposing counsel with copies of filings |
| 6/8/2015 | Earls, Anita Sue | 0.2 | Email | to Emily and Allison re: filings |
| 6/17/2015 | Earls, Anita Sue | 0.5 | Review | filings by opposing counsel |
| 6/18/2015 | Earls, Anita Sue | 0.3 | Review | Court order extending time to answer |
| 7/17/2015 | Earls, Anita Sue | 0.5 | Review | Order reassigning case and email to clients |
| 8/3/2015 | Earls, Anita Sue | 1 | Review | Answer filed by Wake Co. Bd. of Elections |
| 8/18/2015 | Earls, Anita Sue | 0.3 | Review | Order for Discovery Plan |
| 8/24/2015 | Earls, Anita Sue | 1.5 | Review | Amended Answer and email to clients |
| 9/8/2015 | Earls, Anita Sue | 0.3 | Email | to opposing counsel to set up 26(f) meeting |
| 9/9/2015 | Earls, Anita Sue | 0.1 | Email | to opposing counsel confirming call |
| 9/9/2015 | Earls, Anita Sue | 0.75 | Conf. | with Allison & Emily re: litigation schedule |
| Total | | 47.85 | | |

Anita Earls - Time Records**RWCA v. Wake Co. Bd. of Elections & Wright v. NC CONSOLIDATED**

| Date | Timekeeper | Hours | Task | Description |
|-----------|------------------|-------|-----------|------------------------------------------------------------------------|
| 9/11/2015 | Earls, Anita Sue | 0.75 | Conf. | with Charles Marshall re: 26(f) report |
| 9/11/2015 | Earls, Anita Sue | 0.5 | Conf. | with Allison & Emily re: preparing initial disclosures |
| 9/14/2015 | Earls, Anita Sue | 1.5 | Draft | Discovery plan |
| 9/14/2015 | Earls, Anita Sue | 0.3 | Email | to Charles Marshall with proposed discovery plan in both cases |
| 9/16/2015 | Earls, Anita Sue | 0.5 | Email | and telephone conversation about scheduling |
| 9/17/2015 | Earls, Anita Sue | 0.3 | Email | from Charles Marshall re: changes to proposed scheduling plan |
| 9/18/2015 | Earls, Anita Sue | 0.5 | Conf. | and email with Emily re: defendants proposed schedule |
| 9/23/2015 | Earls, Anita Sue | 0.5 | Conf. | with Charles Marshall re: discovery plan |
| 9/23/2015 | Earls, Anita Sue | 0.75 | Edit | file and serve joint discovery report |
| 9/23/2015 | Earls, Anita Sue | 0.2 | Telephone | Call to Clerk's office re: conference with Judge |
| 9/24/2015 | Earls, Anita Sue | 0.2 | Email | with Charles Marshall re: conference with Judge on discovery deadlines |
| 9/24/2015 | Earls, Anita Sue | 0.3 | Email | to clients to set up conference call |
| 9/24/2015 | Earls, Anita Sue | 0.2 | Review | notice from court re: scheduling hearing |
| 9/24/2015 | Earls, Anita Sue | 0.5 | Review | and edit draft initial disclosures |
| 9/25/2015 | Earls, Anita Sue | 0.5 | Review | Draft initial disclosures |
| 9/28/2015 | Earls, Anita Sue | 0.2 | Email | to clients confirming conference call meeting |
| 9/28/2015 | Earls, Anita Sue | 0.3 | Emails | back and forth with clients re: case update and conference call |
| 9/30/2015 | Earls, Anita Sue | 1 | Conf. | with clients re: status of case and next steps |
| 9/30/2015 | Earls, Anita Sue | 0.5 | Conf. | with Emily and Allison re: preparing for scheduling hearing |
| 10/1/2015 | Earls, Anita Sue | 0.75 | Conf. | with Allison re: issues for scheduling conference |
| 10/1/2015 | Earls, Anita Sue | 1.2 | Prepare | for scheduling conference |
| 10/1/2015 | Earls, Anita Sue | 1.8 | Appear | at scheduling confence with Court in Raleigh |
| 10/1/2015 | Earls, Anita Sue | 0.5 | Email | to clients with update on case schedule |
| 10/1/2015 | Earls, Anita Sue | 0.3 | Email | responding to client questions regarding next steps |
| 10/1/2015 | Earls, Anita Sue | 0.1 | Review | court's consolidation and scheduling order |
| 10/1/2015 | Earls, Anita Sue | 0.2 | Email | to Emily attaching pleadings for pleadings file |
| 10/2/2015 | Earls, Anita Sue | 1.5 | Review | & edit draft discovery and trial plan |
| 10/5/2015 | Earls, Anita Sue | 0.2 | Email | to client re: preparing for trial |
| 10/7/2015 | Earls, Anita Sue | 1 | Telephone | to Jowei Chen re: Wake County analysis |
| 10/8/2015 | Earls, Anita Sue | 0.5 | Email | to Dr. Chen with pleadings, to set up conference call |
| 10/8/2015 | Earls, Anita Sue | 0.5 | Review | materials for Dr. Chen |
| 10/8/2015 | Earls, Anita Sue | 0.5 | Conf. | with Allison re: Chen testimony |
| 10/8/2015 | Earls, Anita Sue | 1 | Conf. | with Allison & Emily re: discovery and trial plan |

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| 10/12/2015 Earls, Anita Sue | 1 Conf. | with Dr. Chen re: analysis needed in case |
| 10/20/2015 Earls, Anita Sue | 1.5 Email | and telephone conversation with Tony Fairfax re: demographic analysis |
| 10/20/2015 Earls, Anita Sue | 0.5 Email | retainer letter to Tony Fairfax |
| 10/20/2015 Earls, Anita Sue | 0.4 Conf. | with Fred McBride re: data Fairfax needs |
| 10/20/2015 Earls, Anita Sue | 0.5 Email | to Fairfax with complaint and other materials |
| 10/21/2015 Earls, Anita Sue | 0.6 Emails | to Emily and to Tony Fairfax re: legislative timeline |
| 10/29/2015 Earls, Anita Sue | 1 Conf. | With Allison & Emily re: legislative history transcripts |
| 10/29/2015 Earls, Anita Sue | 0.5 Review | Fairfax draft report |
| 10/29/2015 Earls, Anita Sue | 0.5 Telephone | call with Tony Fairfax re: additional materials needed for analysis |
| 10/30/2015 Earls, Anita Sue | 0.6 Email | to Tony Fairfax re: draft report |
| 10/30/2015 Earls, Anita Sue | 0.4 Review | and respond to email from Allison re: Fairfax report and additional analysis needed |
| 11/2/2015 Earls, Anita Sue | 2.5 Review | Draft expert reports, conf. & emails with Fairfax and Chen, conf. w/Allison, email to opposing counsel se |
| 11/3/2015 Earls, Anita Sue | 0.2 Review | Court filings |
| 11/4/2015 Earls, Anita Sue | 0.75 Review | motion to quash and supporting memorandum |
| 11/9/2015 Earls, Anita Sue | 0.2 Review | email from opposing counsel |
| 11/10/2015 Earls, Anita Sue | 1 Review | draft response opposing motion to quash |
| 11/10/2015 Earls, Anita Sue | 0.2 Telephone | Call from client re: case update |
| 11/13/2015 Earls, Anita Sue | 0.5 Emails | and telephone call from Charles Marshall |
| 11/13/2015 Earls, Anita Sue | 0.75 Review | draft amended disclosures |
| 11/13/2015 Earls, Anita Sue | 0.5 Email | to Charles Marshall re: document requests |
| 11/13/2015 Earls, Anita Sue | 0.2 Review | Supplemental disclosures of legislative materials |
| 11/13/2015 Earls, Anita Sue | 0.4 Email | to Charles Marshall attaching supplemental disclosures |
| 11/16/2015 Earls, Anita Sue | 0.75 Review | documents served by Defendants |
| 11/16/2015 Earls, Anita Sue | 0.5 Email | to Charles Marshall with revisions to email search terms |
| 11/16/2015 Earls, Anita Sue | 0.3 Email | to Dr. Chen re: Defendants' document requests |
| 11/17/2015 Earls, Anita Sue | 0.35 Email | to Fred McBride re: defendants' document request |
| 11/28/2015 Earls, Anita Sue | 0.85 Email | from Jowei Chen with documents requested by Defendants |
| 11/30/2015 Earls, Anita Sue | 2.8 Review | and edit plaintiffs' responses to doc. Requests, email to opposing counsel |
| 11/30/2015 Earls, Anita Sue | 0.5 Review | Case management order and pretrial conference requirements |
| 12/1/2015 Earls, Anita Sue | 0.2 Review | email re: legislative record and conf. w/Emily |
| 12/1/2015 Earls, Anita Sue | 0.3 Email | to Tony Fairfax providing legislative record information |
| 12/1/2015 Earls, Anita Sue | 0.5 Review | documents and email to Emily & Allison re: legislator statements |
| 12/2/2015 Earls, Anita Sue | 0.2 Email | to Fred McBride re: backup for expert witness docs |
| 12/3/2015 Earls, Anita Sue | 0.5 Review | Court order on Motion to Quash |
| 12/3/2015 Earls, Anita Sue | 0.4 Conf. | with George and Allison re: obtaining & reviewing docs. |
| 12/6/2015 Earls, Anita Sue | 1.8 Review | Plaintiffs proposed findings of fact |

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| 12/6/2015 Earls, Anita Sue | 1.5 Review | Draft trial brief |
| 12/7/2015 Earls, Anita Sue | 3.25 Review | Trial plan, mtg. With trial team, prepare outlines |
| 12/8/2015 Earls, Anita Sue | 0.3 Email | to Jowei Chen re: Defendants' Proposed Findings of Fact |
| 12/8/2015 Earls, Anita Sue | 0.5 Review | trial subpoenas |
| 12/8/2015 Earls, Anita Sue | 1.2 Review | draft response to trial beirf |
| 12/8/2015 Earls, Anita Sue | 0.3 Emails | to Dr. Chen re: trial testimony prep |
| 12/9/2015 Earls, Anita Sue | 0.5 Telephone | call with Alec Peters re: compliance with subpoenas |
| 12/9/2015 Earls, Anita Sue | 0.2 Email | to Peters and AG's office re: RWCA pretrial order and exhibit list |
| 12/9/2015 Earls, Anita Sue | 1.4 Review | Defendants' pretrial filings |
| 12/9/2015 Earls, Anita Sue | 1 Conf. | with trial team re: pretrial preparations |
| 12/9/2015 Earls, Anita Sue | 2.2 Review | trial briefs and prepare for trial |
| 12/9/2015 Earls, Anita Sue | 1.5 Review | Trial strategy outline, prepare for trial |
| 12/10/2015 Earls, Anita Sue | 2.5 Appear | at Pre-trial conference; |
| 12/10/2015 Earls, Anita Sue | 1.25 Conf. | with trial team re: prep for trial |
| 12/10/2015 Earls, Anita Sue | 1.5 Prepare | trial witness planner |
| 12/10/2015 Earls, Anita Sue | 2.5 Review | draft proposed stipulations |
| 12/11/2015 Earls, Anita Sue | 1.3 Edit | trial witness planner |
| 12/11/2015 Earls, Anita Sue | 0.35 Email | to Dr. Chen re: trial exhibits |
| 12/11/2015 Earls, Anita Sue | 1.75 Meeting | with Dan Blue to prepare trial testimony |
| 12/12/2015 Earls, Anita Sue | 2.6 Prepare | trial testimony outlines |
| 12/12/2015 Earls, Anita Sue | 0.5 Email | back and forth with Jowei Chen re: trial exhibits |
| 12/12/2015 Earls, Anita Sue | 1.5 Meeting | with trial team to divide tasks and review strategy |
| 12/12/2015 Earls, Anita Sue | 3.5 Prepare | witness testimony outlines |
| 12/12/2015 Earls, Anita Sue | 2.75 Review | Wake Co. School Board emails and docs. |
| 12/12/2015 Earls, Anita Sue | 0.75 Conf. | with trial team re: demonstrative exhibits |
| 12/13/2015 Earls, Anita Sue | 3.5 Prepare | witness outlines and conf. with experts |
| 12/13/2015 Earls, Anita Sue | 1.5 Review | Trial briefs and elements of proof |
| 12/13/2015 Earls, Anita Sue | 2.5 Prepare | witness notebooks |
| 12/13/2015 Earls, Anita Sue | 0.75 Emails | with Dr. Chen re: trial exhibits and testimony outline |
| 12/13/2015 Earls, Anita Sue | 1.5 Review | exhibit list |
| 12/14/2015 Earls, Anita Sue | 1.2 Prepare | Earl Johnson testimony |
| 12/14/2015 Earls, Anita Sue | 2.5 Review | witness testimony of James West & Bill Fletcher |
| 12/14/2015 Earls, Anita Sue | 0.5 Email | to clients with trial info |
| 12/14/2015 Earls, Anita Sue | 1.5 Review | witness testimony outlines - school board witnesses |
| 12/14/2015 Earls, Anita Sue | 1.4 Edit | trial witness planner |
| 12/14/2015 Earls, Anita Sue | 2.3 Review | witness testmony outlines - legislators |

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| 12/15/2015 | Earls, Anita Sue | 3.5 | Prepare | Jowei Chen testimony |
| 12/15/2015 | Earls, Anita Sue | 2.5 | Prepare | witness exhibits |
| 12/15/2015 | Earls, Anita Sue | 3.75 | Prepare | Tony Fairfax witness testimony |
| 12/15/2015 | Earls, Anita Sue | 1.5 | Edit | trial witness planner |
| 12/15/2015 | Earls, Anita Sue | 1.5 | Prepare | opening statement |
| 12/15/2015 | Earls, Anita Sue | 0.5 | Email | to Charles Marshall with updated exhibits |
| 12/15/2015 | Earls, Anita Sue | 2.75 | Prepare | trial notebook and exhibit notebooks |
| 12/16/2015 | Earls, Anita Sue | 9 | Appear | First day of trial |
| 12/16/2015 | Earls, Anita Sue | 3.5 | Prepare | testimony for second day of trial |
| 12/16/2015 | Earls, Anita Sue | 1 | Travel | to and from Raleigh for trial |
| 12/17/2015 | Earls, Anita Sue | 8 | Appear | Second day of trial |
| 12/17/2015 | Earls, Anita Sue | 0.3 | Email | responding to questions regarding legislative privilege |
| 12/17/2015 | Earls, Anita Sue | 3.75 | Prepare | closing argument |
| 12/17/2015 | Earls, Anita Sue | 1 | Travel | to and from Raleigh for trial |
| 12/18/2015 | Earls, Anita Sue | 4.5 | Appear | Third day of trial |
| 12/18/2015 | Earls, Anita Sue | 2.3 | Telephone | calls and emails to clients with trial update |
| 12/18/2015 | Earls, Anita Sue | 1 | Travel | to and from Raleigh for trial |
| 12/21/2015 | Earls, Anita Sue | 0.5 | Email | to clients summarizing trial and next steps |
| 12/21/2015 | Earls, Anita Sue | 1.5 | Review | organize and store trial materials |
| 12/30/2015 | Earls, Anita Sue | 0.5 | Email | re: status of litigation |
| 1/5/2016 | Earls, Anita Sue | 0.2 | Email | responding to request for information on status of case |
| 1/14/2016 | Earls, Anita Sue | 0.2 | Email | re: transcript of trial proceedings |
| 1/26/2016 | Earls, Anita Sue | 0.1 | Email | concerning delay in obtaining trial transcript |
| 1/29/2016 | Earls, Anita Sue | 0.5 | Conf. | with Allison regarding legislators post-trial disclosures |
| 2/4/2016 | Earls, Anita Sue | 0.2 | email | to client regarding status of case |
| 2/26/2016 | Earls, Anita Sue | 1.5 | Review | Email with decision from District Court & emails to Allison |
| 2/29/2016 | Earls, Anita Sue | 2.5 | Review | District court opinion and grounds for appeal |
| 3/1/2016 | Earls, Anita Sue | 0.5 | Email | to clients re: impact of decision |
| 3/2/2016 | Earls, Anita Sue | 1 | Conf Call | Talk with all clients about decision |
| 3/2/2016 | Earls, Anita Sue | 1.2 | Meet | with trial team to discuss next steps |
| 3/3/2016 | Earls, Anita Sue | 0.6 | Draft | email and send to clients update on appeal |
| 3/10/2016 | Earls, Anita Sue | 0.5 | Review | draft notices of appeal, emails to Emily & Allison re: timing of filing |
| 3/15/2016 | Earls, Anita Sue | 0.3 | Conf. | with Allison & Emily re: filing appeal, docketing statement, deadlines |
| 3/16/2016 | Earls, Anita Sue | 0.5 | Review | court notice requesting response to inquiry |
| 3/28/2016 | Earls, Anita Sue | 1.5 | Review | Appellees' filings and response to court inquiry |
| 3/28/2016 | Earls, Anita Sue | 1.25 | Review | Draft notice re: constitutional challenge and Response to inquiry |

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| 3/28/2016 Earls, Anita Sue | 0.5 Edit | Appellants' motion to expedite appeal |
| 3/30/2016 Earls, Anita Sue | 0.3 Review | court order re: record in connection with motion to expedite |
| 4/5/2016 Earls, Anita Sue | 0.25 Review | court order expediting appeal |
| 4/6/2016 Earls, Anita Sue | 0.45 Email | to clients updating status of case |
| 4/6/2016 Earls, Anita Sue | 0.8 Emails | to numerous individual clients responding to questions about appeal |
| 4/7/2016 Earls, Anita Sue | 0.2 Review | Oral argument acknowledgment form |
| 4/8/2016 Earls, Anita Sue | 0.5 Conf. | with Allison & Emily re: oral argument strategy |
| 4/9/2016 Earls, Anita Sue | 1.5 Conf. | with Allison re: Appellants' brief |
| 4/12/2016 Earls, Anita Sue | 1.5 Edit | Draft brief |
| 4/13/2014 Earls, Anita Sue | 0.5 Conf. | With Allison re: joint appendix contents |
| 4/25/2016 Earls, Anita Sue | 1.5 Review | Appellees' brief |
| 4/26/2016 Earls, Anita Sue | 0.5 Conf. | with Allison re: contents of reply brief and divide up drafting |
| 4/27/2016 Earls, Anita Sue | 2.75 Review | legal research and George and Emily's outlines for reply brief |
| 4/28/2016 Earls, Anita Sue | 8.75 Draft | reply brief section on OPOV claims |
| 4/29/2016 Earls, Anita Sue | 3.8 Edit | and proof reply brief |
| 4/29/2016 Earls, Anita Sue | 1.2 Emails | Requesting assistance with oral argument prep to multiple attorneys |
| 5/2/2016 Earls, Anita Sue | 0.4 Emails | and telephone calls re: details of oral argument prep |
| 5/3/2016 Earls, Anita Sue | 0.1 Email | from client re: oral argument & response |
| 5/3/2016 Earls, Anita Sue | 2.5 Review | cases to prepare for oral argument |
| 5/4/2016 Earls, Anita Sue | 4.5 Review | briefs and cases, outline oral argument |
| 5/5/2016 Earls, Anita Sue | 2.25 Draft | outline for oral argument, research cases |
| 5/5/2016 Earls, Anita Sue | 1.5 Conf. | Practice for oral argument |
| 5/6/2016 Earls, Anita Sue | 7.5 Prepare | for oral argument - review expert reports, trial testimony |
| 5/7/2016 Earls, Anita Sue | 6.25 Prepare | outlines of key cases and review briefs |
| 5/7/2016 Earls, Anita Sue | 0.5 Telephone | with clients re: remedy questions |
| 5/8/2016 Earls, Anita Sue | 2.75 Travel | Travel to Richmond |
| 5/8/2016 Earls, Anita Sue | 7.5 Prepare | Review briefs and cases to prepare for argument, assemble notebook |
| 5/9/2016 Earls, Anita Sue | 4.25 Prepare | Practice oral argument & edit outline |
| 5/9/2016 Earls, Anita Sue | 2 Argument | Appear at 4th Circuit Oral argument |
| 5/9/2016 Earls, Anita Sue | 0.75 Meet | with clients to discuss oral argument & next steps |
| 5/9/2016 Earls, Anita Sue | 2.75 Travel | Travel back from Richmond |
| 5/10/2016 Earls, Anita Sue | 0.75 Email | to clients summarizing oral argument |
| 5/31/2016 Earls, Anita Sue | 0.25 Review | Notice from Court re: trial exhibit |
| 5/31/2016 Earls, Anita Sue | 1.25 Draft | Response to court request for exhibit |
| 6/2/2016 Earls, Anita Sue | 0.4 Edit | Edit Response to Court notice and file response |
| 6/23/2016 Earls, Anita Sue | 0.25 Research | factual question from client re: S325 |

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| 6/29/2016 Earls, Anita Sue | 0.6 Email | re: Dr. Chen's report and testimony - request for info |
| 7/1/2016 Earls, Anita Sue | 0.5 Email | to clients re: 4th Circuit opinion |
| 7/1/2016 Earls, Anita Sue | 0.3 Email | to expert witnesses re: outcome of appeal |
| 7/1/2016 Earls, Anita Sue | 1.25 Review | Read Fourth Circuit opinion |
| 7/1/2016 Earls, Anita Sue | 1.5 Conf. | Discuss Fourth Circuit opinion w/ clients |
| 7/2/2016 Earls, Anita Sue | 0.5 Email | and telephone call re: impact of decision |
| 7/5/2016 Earls, Anita Sue | 0.75 Email | to clients re: next steps and setting up conference call |
| 7/6/2016 Earls, Anita Sue | 1.25 Conf. | call with clients re: remedial stage options |
| 7/6/2016 Earls, Anita Sue | 2.8 Draft | letter to opposing counsel re: implementation of remedy |
| 7/6/2016 Earls, Anita Sue | 0.5 Conf. | with Allison & Emily re: remedial steps |
| 7/11/2016 Earls, Anita Sue | 0.5 Review | Court order re: views on court-ordered remedial plan |
| 7/11/2016 Earls, Anita Sue | 0.8 Review | Progress on determining plaintiffs' proposed remedy |
| 7/11/2016 Earls, Anita Sue | 0.5 Telephone | From clients re: Wake Co. Board of Elections meeting |
| 7/12/2016 Earls, Anita Sue | 1.8 Email | and telephone calls re: potential remedial proceedings & timing |
| 7/12/2016 Earls, Anita Sue | 0.5 Legal Rese | re: right to intervene by legislators |
| 7/12/2016 Earls, Anita Sue | 1.5 Telephone | calls from clients re: intervention and remedy issues |
| 7/13/2016 Earls, Anita Sue | 2.8 Research | re: timing and appropriate remedy |
| 7/13/2016 Earls, Anita Sue | 0.6 Conf. | with Allison & Emily re: brief on potential remedy & plaintiff questions |
| 7/14/2016 Earls, Anita Sue | 0.25 Meeting | W/Allison & Emily on Potential Petition for Rehearing |
| 7/14/2016 Earls, Anita Sue | 1.75 Legal Rese | on remedy for briefing to district court |
| 7/14/2016 Earls, Anita Sue | 1.5 Review | Petition for Rehearing |
| 7/14/2016 Earls, Anita Sue | 0.5 Review | Pleadings filed in District court |
| 7/14/2016 Earls, Anita Sue | 2.25 Legal Rese | for Motion to issue mandate |
| 7/14/2016 Earls, Anita Sue | 6.25 Draft | and file motion to issue mandate |
| 7/15/2016 Earls, Anita Sue | 0.5 Review | 4th circuit orders issued |
| 7/15/2016 Earls, Anita Sue | 8.25 Draft | Brief in response to District Court order 7 8 2016 |
| 7/15/2016 Earls, Anita Sue | 0.5 Review | Board of Elections letter regarding remedy |
| 7/16/2016 Earls, Anita Sue | 10 Research | and draft brief on remedy issues |
| 7/17/2016 Earls, Anita Sue | 5.4 Draft | brief on remedy issues |
| 7/18/2016 Earls, Anita Sue | 1.5 Edit | Brief on remedy and file with District Court |
| 7/18/2016 Earls, Anita Sue | 0.8 Review | Response to Order filed by Berger, et. al. |
| 7/18/2016 Earls, Anita Sue | 1.8 Edit | filing on motion to intervene |
| 7/18/2016 Earls, Anita Sue | 1 Research | extent of trial court remedial authority |
| 7/18/2016 Earls, Anita Sue | 0.75 Review | Response to Order filed by Wake Co. Bd. of Elections |
| 7/19/2016 Earls, Anita Sue | 1.2 Review | Pleadings filed in 4th circuit |
| 7/26/2016 Earls, Anita Sue | 0.3 Review | 4th circuit denial of rehearing en banc |

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| 7/26/2016 Earls, Anita Sue | 0.5 Email | to clients with update on status of case |
| 7/26/2016 Earls, Anita Sue | 1.5 Email | and telephone calls from clients re: impact of 4th Cir order |
| 7/27/2016 Earls, Anita Sue | 0.5 Review | District court order re: status conference |
| 7/27/2016 Earls, Anita Sue | 1 Email | to clients and telephone calls re: status conference |
| 7/28/2016 Earls, Anita Sue | 3 Meeting | with clients re: remedial issues & status conference |
| 7/28/2016 Earls, Anita Sue | 3.5 Legal Research | Re: remedy issues |
| 7/29/2016 Earls, Anita Sue | 2 Draft | Memorandum for district court on remedy issues |
| 7/30/2016 Earls, Anita Sue | 4.5 Research | and draft second brief on remedy issues |
| 7/30/2016 Earls, Anita Sue | 0.3 Email | to clients re: hearing on remedy |
| 7/31/2016 Earls, Anita Sue | 4 Draft | brief on remedy |
| 8/1/2016 Earls, Anita Sue | 9.25 Research | and draft brief on remedy |
| 8/2/2016 Earls, Anita Sue | 1.5 Edit | remedy brief and file |
| 8/2/2016 Earls, Anita Sue | 1 Travel | to and from Raleigh for hearing on remedy |
| 8/2/2016 Earls, Anita Sue | 1.5 Attend | prepare for and attend hearing in front of Dever on remedy |
| 8/2/2016 Earls, Anita Sue | 0.5 Meeting | with clients and counsel after hearing to discuss next steps |
| 8/3/2016 Earls, Anita Sue | 1.5 Research | factual question raised by court during 8/4/2016 hearing |
| 8/3/2016 Earls, Anita Sue | 2.5 Draft | and file post-hearing memorandum |
| 8/3/2016 Earls, Anita Sue | 1.5 Review | proposed remedial maps, conf. w/Fred McBride re: districts |
| 8/3/2016 Earls, Anita Sue | 0.25 Review | 4th Circuit order on motions & mandate |
| 8/3/2016 Earls, Anita Sue | 0.5 Email | to opposing counsel Re: motion to strike |
| 8/4/2016 Earls, Anita Sue | 1.3 Review | McBride analysis of alternative maps |
| 8/4/2016 Earls, Anita Sue | 0.5 Review | District Court order re: request for briefing on remedy |
| 8/4/2016 Earls, Anita Sue | 0.3 Email | to clients re: alternative districts |
| 8/4/2016 Earls, Anita Sue | 0.75 Telephone | from clients re: potential district remedies |
| 8/5/2016 Earls, Anita Sue | 0.5 Conf. | with Allison re: motion to strike |
| 8/5/2016 Earls, Anita Sue | 1.8 Edit | and file Motion to strike & accompanying memorandum |
| 8/5/2016 Earls, Anita Sue | 5.2 Draft | Response to Aug. 4 Court Order |
| 8/5/2016 Earls, Anita Sue | 0.8 Edit | incorporate changes to Response |
| 8/7/2016 Earls, Anita Sue | 0.3 Review | Order of district court |
| 8/7/2016 Earls, Anita Sue | 0.2 Email | to Charles Marshall re: consent to motion for extension of time |
| 8/8/2016 Earls, Anita Sue | 0.2 Email | to Fred McBride re: obtaining shape files to evaluate districts |
| 8/8/2016 Earls, Anita Sue | 0.5 Email | to clients with status of case |
| 8/9/2016 Earls, Anita Sue | 0.3 Email | to opposing counsel |
| 8/10/2016 Earls, Anita Sue | 0.2 Email | to Charles Marshall re: motion for extension of time |
| 8/11/2016 Earls, Anita Sue | 0.3 Review | and respond to email from Marshall re: motion for extension of time |
| 8/12/2016 Earls, Anita Sue | 0.2 Email | to Emily re: filing motion for extension of time |

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| 8/15/2016 | Earls, Anita Sue | 0.5 Telephone | conference with clients re: status and next steps |
| 8/17/2016 | Earls, Anita Sue | 0.5 Review | Bill of costs in 4th Circuit |
| 8/18/2016 | Earls, Anita Sue | 0.5 Conf. | with Allison re: meeting with clients |
| 9/21/2016 | Earls, Anita Sue | 0.2 Email | to Jowei Chen responding to question about trial testimony |
| 9/22/2016 | Earls, Anita Sue | 1.5 Research | re: standards for fee petition |
| 9/27/2016 | Earls, Anita Sue | 2.5 Research | on fees awards in voting rights cases |
| 10/3/2016 | Earls, Anita Sue | 1.5 Review | time records to prepare fee petition |
| 10/4/2016 | Earls, Anita Sue | 2.25 Review | staff time records relating to fee petition |
| 10/5/2016 | Earls, Anita Sue | 2.6 Draft | summary of time and expenses |
| 10/5/2016 | Earls, Anita Sue | 1 Meeting | with Charles Marshall re: fees |
| 10/6/2016 | Earls, Anita Sue | 0.2 Email | to Charles Marshall re: additional extension of time |
| 11/7/2016 | Earls, Anita Sue | 0.2 Email | and telephone call to C. Marshall re: fee petition |
| 11/19/2016 | Earls, Anita Sue | 6.5 Review | fee petition materials |
| 11/20/2016 | Earls, Anita Sue | 7 Review | time and expense records, eliminate double-entries, |
| 11/21/2016 | Earls, Anita Sue | 3.5 Edit | fee petition & memorandum |
| 11/22/2016 | Earls, Anita Sue | 4 Review | draft affidavits and fee records |
| TOTAL | | 390.8 | |

Allison Riggs - Wright/RWCA Time Records

| Date | Timekeeper | Hours | Task | Description |
|-------------|-------------------|--------------|-------------------|-------------------------------------------------------------------------|
| 3/25/2013 | Allison Riggs | 0.35 | Draft | Letter for public hearing |
| 3/25/2013 | Allison Riggs | 0.8 | Draft | Public hearing letter |
| 3/25/2013 | Allison Riggs | 3.18 | Appear at Hearing | finalizing testimony and attending hearing |
| 5/8/2013 | Allison Riggs | 0.65 | Mtg | school assignment zone alignment w/ CK |
| 6/13/2013 | Allison Riggs | 1 | Telephone call | calls/emails w/ Chris Ketchie re: final verison; call with N&O reporter |
| 6/18/2013 | Allison Riggs | 0.5 | Draft | complaint |
| 6/19/2013 | Allison Riggs | 1.17 | Draft | complaint |
| 6/19/2013 | Allison Riggs | 0.55 | Telephone call | call w/ client |
| 6/20/2013 | Allison Riggs | 2.23 | Legal Research | Larios Complaint |
| 6/21/2013 | Allison Riggs | 0.7 | Review | Larios litigation |
| 6/24/2013 | Allison Riggs | 1 | Review | Larios pleadings |
| 6/24/2013 | Allison Riggs | 5.05 | Draft | complaint |
| 7/9/2013 | Allison Riggs | 0.7 | Draft | complaint |
| 8/12/2013 | Allison Riggs | 4.83 | Draft | complaint; meet w/ CK re data |
| 8/14/2013 | Allison Riggs | 4.52 | Draft | complaint |
| 8/22/2013 | Allison Riggs | 2 | Filing in office | finishing and filing the complaint |
| 8/22/2013 | Allison Riggs | 1.43 | Draft | summons/corporate disclosure |
| 8/23/2013 | Allison Riggs | 0.45 | Filing in office | fixing ECF mistake |
| 8/23/2013 | Allison Riggs | 1 | Filing in office | filing corporate/financial disclosure statements |
| 11/5/2013 | Allison Riggs | 0.67 | Review | Ds answer to complaint |
| 5/20/2014 | Allison Riggs | 1.25 | Review | Draft of 4th Cir Appeals brief |
| 5/20/2014 | Allison Riggs | 0.33 | Call | Talking to Anita about 4th Cir appeals brief |
| 7/1/2014 | Allison Riggs | 1 | Review | Defs' 4th Cir brief |
| 11/19/2014 | Allison Riggs | 0.37 | Telephone call | w/ potential judge for moot for Anita's 4th Cir. argument |
| 11/20/2014 | Allison Riggs | 0.5 | email to | 2 potential judges re: moot |
| 11/24/2014 | Allison Riggs | 0.25 | email to | potential judge re serving as a moot judge |
| 11/24/2014 | Allison Riggs | 0.42 | Telephone call | w/ potential judge and follow up email with materials for moot |
| 11/24/2014 | Allison Riggs | 2 | Filing in office | prepping case notebooks and briefing notebooks for 4th Cir. arguments |
| 11/24/2014 | Allison Riggs | 0.25 | Telephone call | w/ potential judge and follow up email about potential moot involvement |
| 12/1/2014 | Allison Riggs | 0.25 | email to | call and email to potential judge about moot |

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| 12/1/2014 Allison Riggs | 0.33 email to | email and call to potential judge about moot |
| 12/1/2014 Allison Riggs | 0.27 email to | telephone call and email to NCCU about using moot courtroom |
| 12/1/2014 Allison Riggs | 0.25 email to | email and call to potential judge about moot on Friday |
| 12/1/2014 Allison Riggs | 0.28 email to | email and call to potential judge about internal moot on Thursday |
| 12/2/2014 Allison Riggs | 0.17 email to | email to potential judges about moot on Friday |
| 12/3/2014 Allison Riggs | 0.2 email to | telephone call and email to NCCU about using moot courtroom |
| 12/3/2014 Allison Riggs | 0.17 email to | potential judges about moot on Friday |
| 12/3/2014 Allison Riggs | 0.2 email to | email and call to potential judge re moot |
| 12/4/2014 Allison Riggs | 1.17 Attend | internal moot for Anita's argument |
| 12/4/2014 Allison Riggs | 0.75 Draft | mock state argument |
| 12/4/2014 Allison Riggs | 0.58 Review | appellate pleadings |
| 12/4/2014 Allison Riggs | 0.25 Draft | questions for Anita at internal moot |
| 12/5/2014 Allison Riggs | 1.83 Attend | moot at NCCU |
| 12/8/2015 Allison Riggs | 1 Draft | Reasons for Deviations cheat sheet for Anita |
| 12/9/2014 Allison Riggs | 3.17 Travel | to Richmond for argument |
| 12/9/2014 Allison Riggs | 1.5 Attend | last minute moot for Anita |
| 12/9/2014 Allison Riggs | 4.5 Prepare | Legal research and one-pagers for Anita's argument |
| 12/9/2014 Allison Riggs | 0.58 Telephone call | radio interview w/ WUNC about case |
| 12/9/2014 Allison Riggs | 0.25 Telephone call | answering media inquiries from News & Observer |
| 12/9/2014 Allison Riggs | 0.5 Prepare | gathering materials needed to bring to Richmond for argument |
| 12/10/2014 Allison Riggs | 4.25 Appear at Hearing | argument in 4th Circuit case, debrief after |
| 12/10/2014 Allison Riggs | 0.42 email to | moot judges updating them about the argument, response emails |
| 12/10/2014 Allison Riggs | 2.75 Travel | back from Richmond for argument |
| 5/27/2015 Allison Riggs | 1.25 Review | Wright opinion from Fourth Circuit |
| WRIGHT ONLY SUBTOTAL | 66.02 | |
| 4/9/2015 Allison Riggs | 1.25 Edit | Review and edit draft complaint |
| 9/9/2015 Allison Riggs | 1.67 Prepare | Prepare for 26(f) conference (discussion topics, suggested points of agreement) |
| 9/11/2015 Allison Riggs | 0.75 Attend | 26(f) conference |
| 9/14/2015 Allison Riggs | 1.5 Review | Draft Discovery Plan - make suggested additions |
| 9/25/2015 Allison Riggs | 0.67 Edit | Final 26(a) disclosures |
| 9/30/2015 Allison Riggs | 0.75 Conference Call | Updating clients |
| 10/1/2015 Allison Riggs | 1.75 Attend | Travel to and attend scheduling conference w/ Judge in Raleigh |

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| 10/12/2015 Allison Riggs | 1 Conference Call | W/ Dr. Chen about expert analysis |
| 10/14/2015 Allison Riggs | 0.67 Edit | Legislator subpoena attachments |
| 10/15/2015 Allison Riggs | 1.5 Draft | Chen retainer agreement |
| 10/15/2015 Allison Riggs | 0.33 Edit | Erika Churchill subpoena attachment |
| 10/20/2015 Allison Riggs | 1.33 Meeting | Interviewing potential witness Darren Jackson |
| 10/28/2015 Allison Riggs | 1.75 Meeting | Interviewing potential witness Amy Womble |
| 10/28/2015 Allison Riggs | 1.5 Meeting | Interviewing potential witness Grier Martin; travel from meeting |
| 10/29/2015 Allison Riggs | 1.5 Meeting | Interviewing potential witness John Burns; travel to meeting |
| 10/29/2015 Allison Riggs | 1.5 Meeting | Interviewing potential witness Dan Blue; travel from meeting |
| 10/30/2015 Allison Riggs | 0.5 Email to | Follow up for Amy Womble; gathering maps, stats |
| 10/30/2015 Allison Riggs | 1.5 Review | Review and provide feedback on draft Fairfax report |
| 11/1/2015 Allison Riggs | 0.5 Review | Review and provide feedback on later draft Fairfax report |
| 11/1/2015 Allison Riggs | 1.25 Call | phone call with Jowei Chen about report |
| 11/6/2015 Allison Riggs | 2.5 Legal Research | Opposition to Motion to Quash Subpoenas |
| 11/9/2015 Allison Riggs | 5.67 Draft | Opposition to Motion to Quash Subpoenas |
| 11/10/2015 Allison Riggs | 1.5 Meeting | Interviewing potential witness Greg Flynn |
| 11/10/2015 Allison Riggs | 1.5 Meeting | Interviewing potential witness Caroline Sullivan |
| 11/10/2015 Allison Riggs | 0.75 Draft | Pre-trial brief |
| 11/10/2015 Allison Riggs | 3 Legal Research | Opposition to Motion to Quash Subpoenas |
| 11/10/2015 Allison Riggs | 3.5 Draft | Opposition to Motion to Quash Subpoenas |
| 11/10/2015 Allison Riggs | 1.27 Edit | Revise and incorporate edits to Opposition to Motion to Quash Subpoenas |
| 11/11/2015 Allison Riggs | 2.25 Meeting | Interviewing potential witness James West; travel to meeting |
| 11/11/2015 Allison Riggs | 1.17 Call | Phone interview with potential witness Bill Fletcher |
| 11/13/2016 Allison Riggs | 1 Review | Transcript from 3/5 and 3/10 hearing on SB 181 |
| 11/16/2016 Allison Riggs | 3 Review | Transcripts from 2013 hearings on SB 325 |
| 11/16/2016 Allison Riggs | 1.5 Review | Transcripts from 3/11 and 3/12 hearing on SB 181, jot down notes |
| 11/30/2015 Allison Riggs | 4 Draft | Exhibit list, assemble exhibits |
| 12/1/2015 Allison Riggs | 2.25 Meeting | w/ paralegal Shannon Christian about support needs for RWCA trial |
| 12/2/2015 Allison Riggs | 3.33 Meeting | w/ paralegal Shannon Christian about exhibits for RWCA trial |
| 12/3/2015 Allison Riggs | 4.5 Analyze | School base attendance maps compared to district maps |
| 12/3/2015 Allison Riggs | 3 Legal Research | Pre-trial Brief and Conclusions of Law |
| 12/4/2015 Allison Riggs | 2.25 Meeting | w/ Jannet Barnes to prepare for trial testimony |
| 12/4/2015 Allison Riggs | 1.33 Draft | Draft trial witness schedule; assignment of attorneys to witnesses |

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| 12/4/2015 Allison Riggs | 0.5 Draft | Trial witness list for Ds |
| 12/4/2015 Allison Riggs | 2.67 Draft | Pre-trial order |
| 12/5/2015 Allison Riggs | 1.25 Draft | Pre-trial order |
| 12/5/2015 Allison Riggs | 5.25 Draft | Pre-trial Brief |
| 12/5/2015 Allison Riggs | 6.25 Draft | Pre-Trial FoF/CoL |
| 12/6/2015 Allison Riggs | 9 Draft | Pre-trial Brief |
| 12/6/2015 Allison Riggs | 1.67 Prepare | Find missing exhibits for exhibit notebook compilation |
| 12/6/2015 Allison Riggs | 0.33 Edit | Exhibit list |
| 12/6/2015 Allison Riggs | 1 Call | Phone interview w/ potential witness Gerry Cohen |
| 12/6/2015 Allison Riggs | 1 Call | Phone interview w/ potential witness Perry Woods |
| 12/7/2015 Allison Riggs | 3.75 Draft | Pre-Trial FoF/CoL |
| 12/7/2015 Allison Riggs | 2 Edit | Revise and incorporate edits to pre-trial brief |
| 12/7/2015 Allison Riggs | 2.83 Edit | Revise and incorporate edits to FoF/CoL |
| 12/7/2015 Allison Riggs | 0.5 File | Pre-trial brief; Pre-trial CoL/FoF; appendices |
| 12/8/2015 Allison Riggs | 0.75 Review | Ds Pretrial Brief |
| 12/8/2015 Allison Riggs | 3.5 Legal Research | For Pre-Trial Response Brief |
| 12/8/2015 Allison Riggs | 7 Draft | Pre-Trial Response Brief |
| 12/9/2015 Allison Riggs | 2 Legal Research | Pre-Trial Response Brief |
| 12/9/2015 Allison Riggs | 8 Draft | Pre-Trial Response Brief |
| 12/9/2015 Allison Riggs | 2.17 Edit | edit Pre-Trial Response Brief; incorporate edits; file |
| 12/10/2016 Allison Riggs | 2.5 Attend | PreTrial Conference |
| 12/10/2015 Allison Riggs | 1.25 Meeting | Trial team meeting; prep to-do list for |
| 12/10/2015 Allison Riggs | 0.75 Review | Review and edit Joint Stips |
| 12/10/2015 Allison Riggs | 1.5 Meeting | witness prep with John Burns |
| 12/10/2015 Allison Riggs | 1 Draft | Blue outline examination |
| 12/11/2015 Allison Riggs | 1.66 Meeting | witness prep with Dan Blue |
| 12/11/2015 Allison Riggs | 1.75 Draft | Burns outline examination |
| 12/11/2015 Allison Riggs | 3 Meeting | witness prep with Amy Womble |
| 12/11/2015 Allison Riggs | 1 Meeting | W/ Fred re: demonstratives for Womble testimony |
| 12/12/2015 Allison Riggs | 2.17 Meeting | w/ trial witness Bill Fletcher |
| 12/12/2015 Allison Riggs | 1.25 Draft | Trial Prep Supplies and Tasks List |
| 12/12/2015 Allison Riggs | 0.75 Call | w/ Amy Womble about testimony |
| 12/12/2015 Allison Riggs | 1.5 Draft | Barnes examination outline |
| 12/13/2015 Allison Riggs | 2.25 Meeting | Working with Kinkos staff on demonstratives |

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| 12/13/2015 Allison Riggs | 2.33 Draft | Fletcher examination outline |
| 12/13/2015 Allison Riggs | 2.25 Edit | Edit the Kushner/Jackson examination outlines for George |
| 12/13/2015 Allison Riggs | 1.83 Draft | West examination outline |
| 12/14/2015 Allison Riggs | 6 Prepare | Trial prep; witness prep |
| 12/14/2015 Allison Riggs | 1.25 Edit | Revisions and additions to joint stip |
| 12/14/2015 Allison Riggs | 0.83 Edit | Edit the Jensen outline for George |
| 12/14/2015 Allison Riggs | 5.16 Prepare | Trial prep; opening argument |
| | | Revisions to trial exhibit list and correspondence w/ opposing counsel |
| 12/15/2015 Allison Riggs | 0.83 Edit | about the same |
| 12/15/2015 Allison Riggs | 7.25 Prepare | Trial prep; packing up materials; witness prep |
| 12/15/2015 Allison Riggs | 6.66 Prepare | Trial prep; exhibit binders; opening argument |
| 12/16/2015 Allison Riggs | 1 Prepare | final prep and review for opening argument |
| 12/16/2015 Allison Riggs | 9 Attend | first day of trial |
| | | updating exhibit list; reviewing late disclosed legislative production; prep |
| 12/16/2015 Allison Riggs | 4.75 Prepare | for witnesses on 2nd day of trial |
| 12/17/2015 Allison Riggs | 6 Attend | second day of trial |
| | | Research for closing arguments; powerpoint for closing arguments; |
| 12/17/2015 Allison Riggs | 6.25 Prepare | practice closing arguments; final exhibit list and additions to notebook |
| 12/18/2015 Allison Riggs | 1 Meeting | final prep for closing arguments |
| 12/18/2015 Allison Riggs | 2 Prepare | third day of trial |
| 1/29/2016 Allison Riggs | 1 Review | Reviewing late produced discovery from legislators |
| 2/26/2016 Allison Riggs | 2.25 Review | RWCA decision from D/C |
| 2/26/2016 Allison Riggs | 1 Prepare | Attempts to convert decision into email-able size for clients |
| 2/26/2016 Allison Riggs | 1.25 Call | Talk with individual clients about decision |
| 2/27/2016 Allison Riggs | 0.75 Call | Talk with individual clients about decision |
| 3/2/2016 Allison Riggs | 0.5 Conf Call | Talk with all clients about decision |
| 3/2/2016 Allison Riggs | 1.166 Meet | Litigation team meeting about decision and next steps |
| 3/3/2016 Allison Riggs | 0.25 Call | Update individual client on decision |
| 3/8/2016 Allison Riggs | 0.166 Email | To expert (Chen) re: D/C decision |
| | | Review Emily's research on consolidation on appeal and filing order; email |
| 3/9/2016 Allison Riggs | 0.5 Review | to Anita about same |
| 3/9/2016 Allison Riggs | 0.33 Review | Review Emily's draft issues on appeal |
| 3/10/2016 Allison Riggs | 0.33 Call | Update expert on D/C decision |

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| 3/28/2016 Allison Riggs | 1.25 Review | Draft consolidation motions, corporate disclosures, docketing statements, notice of constitutional challenges |
| 3/28/2016 Allison Riggs | 0.75 Edit | Editing motion to expedite appeal |
| 3/28/2016 Allison Riggs | 0.25 Call | W/opposing counsel re: motion to expedite (voicemail + returned call) |
| 3/28/2016 Allison Riggs | 0.17 File | Draft and file notice of appearance |
| 4/5/2016 Allison Riggs | 2 Legal Research | Legal research for opening brief |
| 4/6/2016 Allison Riggs | 5.5 Draft | Draft Appellants Opening Brief |
| 4/6/2016 Allison Riggs | 0.1 Email | Setting up conference call re JA |
| 4/7/2016 Allison Riggs | 0.75 Meet | meet w/Emily about assembling JA |
| 4/8/2016 Allison Riggs | 6.33 Draft | Draft Appellants Opening Brief |
| 4/8/2016 Allison Riggs | 3 Legal Research | Legal research for opening brief |
| 4/8/2016 Allison Riggs | 0.33 Conf Call | Prep for and call w/Opposing counsel re JA |
| 4/9/2016 Allison Riggs | 8.75 Draft | Draft Appellants Opening Brief |
| 4/9/2016 Allison Riggs | 5 Legal Research | Legal research for opening brief |
| 4/10/2016 Allison Riggs | 7.75 Draft | Draft Appellants Opening Brief |
| 4/10/2016 Allison Riggs | 1.1 Review | Review draft JA List, track down missing documents |
| 4/11/2016 Allison Riggs | 1.33 Edit | Editing opening brief |
| 4/12/2016 Allison Riggs | 3.25 Draft | revising summary of argument for opening brief; further editing |
| 4/13/2016 Allison Riggs | 1.67 Edit | Incorporating Anita's edits to brief; my own further editing |
| 4/13/2016 Allison Riggs | 1.25 Review | Finalizing Joint Appendix |
| 4/14/2016 Allison Riggs | 1.5 Edit | Page proofing for brief; filling in missing citations |
| 4/15/2016 Allison Riggs | 1.25 Edit | final page proofing for opening brief |
| 4/25/2016 Allison Riggs | 1.33 Review | Reading Appellees's Brief |
| 4/26/2016 Allison Riggs | 1.33 Draft | Outlining notes and thoughts for reply brief |
| 4/29/2016 Allison Riggs | 2.5 Draft | Racial predominance section of reply brief |
| 4/29/2016 Allison Riggs | 3 Edit | Reply brief edits and page proofing |
| 5/5/2016 Allison Riggs | 1.25 Draft | Oral argument piece on racial gerrymandering |
| 5/5/2016 Allison Riggs | 1.5 Meeting | Internal moot for Fourth Circuit argument |
| 5/8/2016 Allison Riggs | 0.17 Email to | Correspondence with clients on oral argument |
| 5/8/2016 Allison Riggs | 2.75 Travel | Travel to Richmond |
| 5/8/2016 Allison Riggs | 4 Prepare | Prepare for oral argument |
| 5/9/2016 Allison Riggs | 4.25 Prepare | Prepare for oral argument |
| 5/9/2016 Allison Riggs | 0.6 Prepare | Check on panel assignment at court |
| 5/9/2016 Allison Riggs | 2 Argument | Oral argument in front of Fourth Circuit |

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| 5/9/2016 Allison Riggs | 0.75 Meet | Debrief with clients on oral argument |
| 5/9/2016 Allison Riggs | 2.75 Travel | Travel back from Richmond |
| 5/31/2016 Allison Riggs | 0.25 Review | Court's request for exhibit |
| 5/31/2016 Allison Riggs | 0.75 Research | Find exhibit and pull for court |
| 6/2/2016 Allison Riggs | 0.166 Edit | Edit responses to Court's request for exhibit |
| 7/1/2016 Allison Riggs | 1.25 Review | Read Fourth Circuit opinion |
| 7/1/2016 Allison Riggs | 1.5 Confer | Discuss Fourth Circuit opinion w/ clients |
| 7/7/2016 Allison Riggs | 1.25 Legal Research | Filing for taxable costs and non-taxable costs |
| 7/8/2016 Allison Riggs | 2.5 Legal Research | Attorney's fees application |
| | | compile time records and review financial records for attorney's fees application |
| 7/8/2016 Allison Riggs | 5 Prepare | |
| 7/8/2016 Allison Riggs | 1 Review | Order from District Court on remedy |
| 7/11/2016 Allison Riggs | 0.5 Telephone Call | to potential declarants in support of remedy brief |
| 7/11/2016 Allison Riggs | 0.25 Telephone Call | w/ Gerry Hebert about declaration in support of fees |
| 7/11/2016 Allison Riggs | 1.75 Draft | Draft Hebert's declaration based on his opinions conveyed by phone |
| | | telephone call and follow up emails w/ Eddie Speas about declaration in support |
| 7/12/2016 Allison Riggs | 0.33 Telephone Call | |
| | | |
| 7/12/2016 Allison Riggs | 1.5 Draft | initial draft of Speas declaration based on information conveyed via phone |
| 7/14/2016 Allison Riggs | 0.25 Meeting | W/Earls and Seawell on Petition for Rehearing about to be filed |
| 7/14/2016 Allison Riggs | 1.25 Legal Research | on remedy for briefing to district court |
| 7/14/2016 Allison Riggs | 2.5 Legal Research | on legislators motion to intervene in appellate stage |
| 7/14/2016 Allison Riggs | 1 Legal Research | on legislative standing for intervention |
| 7/15/2016 Allison Riggs | 6.5 Draft | Opposition to Motion to Intervene in 4th Cir |
| 7/18/2016 Allison Riggs | 1.17 Edit | Response to DC's 7 8 16 order |
| 7/18/2016 Allison Riggs | 2 Draft | Finish drafting opposition to motion to intervene |
| 7/18/2016 Allison Riggs | 1.75 Edits | editing the opposition to motion to intervene |
| 7/26/2016 Allison Riggs | 0.5 Draft | RWCA press release |
| 7/29/2016 Allison Riggs | 1 Legal Research | on standards for writ of prohibition in 4th Cir |
| 8/3/2016 Allison Riggs | 0.5 Travel | to Raleigh for hearing on remedy |
| 8/3/2016 Allison Riggs | 1.5 Attend | prepare for and attend hearing in front of Dever on remedy |
| 8/3/2016 Allison Riggs | 0.5 Meeting | confer with clients after hearing |
| 8/3/2016 Allison Riggs | 0.5 Travel | Travel back to Durham after hearing |
| 8/5/2016 Allison Riggs | 7 Draft | Memo in support of motion to strike alternate map |

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| 8/8/2016 Allison Riggs | 0.75 Telephone Call | w/ Joseph Fedrowitz about a declaration re: implementation of different remedial options |
| 8/8/2016 Allison Riggs | 1 Draft | declaration of Joseph Fedrowitz |
| 8/15/2016 Allison Riggs | 0.5 Telephone Call | w/ RWCA client re: remedy |
| 8/17/2016 Allison Riggs | 1.67 Research | rules on appellate bill of costs |
| 8/17/2016 Allison Riggs | 2.5 Draft | Fourth Circuit bill of costs |
| 8/17/2016 Allison Riggs | 1.5 Prepare | supporting documents for 4th Cir bill of costs |
| 8/18/2016 Allison Riggs | 0.5 Conf Call | w/clients |
| 8/18/2016 Allison Riggs | 0.75 Travel | to Raleigh for RWCA meeting |
| 8/18/2016 Allison Riggs | 1.5 Meeting | w/RWCA clients |
| 8/18/2016 Allison Riggs | 0.75 Travel | to Raleigh for RWCA meeting |
| 8/19/2016 Allison Riggs | 0.75 Review | 8/19 letter from Shannon Joseph |
| 8/19/2016 Allison Riggs | 0.75 Telephone Call | w/ Marshall about Sullivan letter |
| 8/21/2016 Allison Riggs | 0.5 Telephone Call | w/clients |
| 8/22/2016 Allison Riggs | 1 Telephone Call | w/ client about remedy situation |
| 8/22/2016 Allison Riggs | 1.25 Telephone Call | w/ group of clients about remedy situation |
| 8/22/2016 Allison Riggs | 0.5 Email to | Anita updating her on case developments |
| 8/22/2016 Allison Riggs | 0.5 Telephone Call | w/ Marshall about Sullivan motion |
| 8/22/2016 Allison Riggs | 0.66 Email to | Clients w/ update |
| 10/4/2016 Allison Riggs | 3.5 Prepare | expense records for fees petition |
| | | Assemble George, Emily and my time records for prep for meeting w/ Marshall |
| 10/4/2016 Allison Riggs | 0.75 Prepare | |
| 10/5/2016 Allison Riggs | 1 Meeting | W/ Charles Marshall about fees petition |
| 11/16/2016 Allison Riggs | 0.25 Telephone Call | and follow up email re: Crowell affidavit in support of fees |
| | | Draft initial version of Crowell declaration and send to him for his additions/edits |
| 11/18/2016 Allison Riggs | 1 Draft | |
| 11/18/2016 Allison Riggs | 0.33 Finalize | Hebert declaration and send to him |
| 11/20/2016 Allison Riggs | 0.5 Finalize | Speas declaration and send to him |
| | | |
| 11/22/2016 Allison Riggs | 4.5 Draft | District Court Bill of Costs, AJR affidavit in support, and memo in support |
| 11/23/2016 Allison Riggs | 2.5 Draft | Riggs declaration in support of fees application |

RWCA/Wright Subtotal

389.11

RWCA/Wright Time Records - Emily Seawell

| Date | Case | Work description | Hours |
|-------------|-------------|------------------------------------------------------------------------------------------------|--------------|
| 3/5/2015 | RWCA | Attended legislative committee hearing on SB181 | 0.5 |
| 3/10/2015 | RWCA | Attended legislative committee hearing on SB181 | 0.5 |
| 3/11/2015 | RWCA | Listened to and took notes on legislative floor debate on SB181 | 0.5 |
| 3/12/2015 | RWCA | Listened to and took notes on legislative floor debate on SB181 | 0.33 |
| 3/23/2015 | RWCA | Drafted bill analysis for SB181 | 1 |
| 3/31/2015 | RWCA | Updated bill analysis for SB181 | 0.5 |
| 3/31/2015 | RWCA | Attended legislative committee hearing on SB181 | 1 |
| 4/1/2015 | RWCA | Listened to legislative floor debate on SB181 | 0.75 |
| 4/2/2015 | RWCA | Tracked bill status for SB181 | 0.5 |
| 4/9/2015 | RWCA | Read and made suggestions for draft complaint in RWCA | 0.75 |
| 6/10/2015 | Wright | Read petition for rehearing | 0.33 |
| 6/17/2015 | Wright | Read order requiring response to petition for rehearing | 0.08 |
| 6/24/2015 | Wright | Researched and drafted language for proposition that State may not file a response to petition | 2 |
| 6/25/2015 | Wright | Researched and drafted language for proposition that State may not file a response to petition | 2 |
| 6/29/2015 | Wright | Cite checked and edited response to petition for rehearing | 4 |
| 6/29/2015 | Wright | Read State's response to petition for rehearing | 0.33 |
| 6/29/2015 | Wright | Researched Fourth Circuit local rules on formatting of petitions for rehearing | 0.33 |
| 7/16/2015 | Wright | Read Fourth Circuit order on petition for rehearing | 0.08 |
| 8/3/2015 | RWCA | Read Defendant's Answer | 0.25 |
| | | | |
| 9/11/2015 | Both | Participated in call with defense counsel about 26(f) plan | 0.75 |
| 9/11/2015 | Both | Edited draft 26(f) reports | 0.5 |
| 9/14/2015 | Both | Edited draft 26(f) reports | 0.25 |
| 9/16/2015 | Both | Participated in call with defense counsel about 26(f) plan | 0.5 |
| 9/18/2015 | Both | Reviewed revised 26(f) report | 0.25 |
| 9/24/2015 | Both | Drafted initial disclosures | 0.5 |
| 9/25/2015 | Both | Served initial disclosures on defense counsel | 0.17 |
| 9/25/2015 | Both | Read Defendant's initial disclosures | 0.17 |
| 9/30/2015 | Both | Emails regarding submitted 26(f) reports | 0.17 |
| 9/30/2015 | Both | Read court order re: scheduling conference | 0.08 |
| 9/30/2015 | Both | Emailed clients regarding client call | 0.25 |
| 9/30/2015 | Both | Client call | 0.75 |

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| 10/1/2015 | Both | Printed and compiled pleadings notebook for scheduling conference | 0.5 |
| 10/1/2015 | Both | Attended scheduling conference | 1 |
| 10/5/2015 | Both | Read correspondence re: exit polling | 0.08 |
| 10/11/2015 | Both | Call with Jowei Chen | 0.5 |
| 10/13/2015 | Both | Arranged conference space for witness interviews | 0.33 |
| 10/13/2015 | Both | Arranged interview with Rosa Gill | 0.17 |
| 10/13/2015 | Both | Arranged interview with Josh Stein | 0.17 |
| 10/13/2015 | Both | Researched and drafted documents on legislative testimony and past election results | 4 |
| 10/14/2015 | Both | Drafted subpoenas for legislators and staff | 2 |
| 10/15/2015 | Both | Arranged interview with Rosa Gill | 0.17 |
| 10/15/2015 | Both | Arranged interview with Tom Jensen | 0.17 |
| 10/15/2015 | Both | Arranged interview with Darren Jackson | 0.17 |
| 10/15/2015 | Both | Arranged interview with Yevonne Brannon | 0.17 |
| 10/15/2015 | Both | Arranged interview with Amy Womble | 0.17 |
| 10/15/2015 | Both | Drafted subpoenas and researched rules on service | 1 |
| 10/15/2015 | Both | Emailed legislative counsel re: serving subpoenas | 0.25 |
| 10/16/2015 | Both | Emails re: witness interview schedule and supporting documents | 0.17 |
| 10/16/2015 | Both | Compiled and printed supporting documents for witness interviews | 2 |
| 10/16/2015 | Both | Witness interviews | 6 |
| 10/16/2015 | Both | Meeting with Fred McBride re: alternate maps | 0.17 |
| 10/16/2015 | Both | Arranged interview with Tom Jensen | 0.17 |
| 10/16/2015 | Both | Arranged interview with Brian Fitzsimmons | 0.17 |
| 10/16/2015 | Both | Arranged interview with Earl Johnson | 0.17 |
| 10/16/2015 | Both | Arranged interview with Yevonne Brannon | 0.17 |
| 10/19/2015 | Both | Emails re: witness interview schedule and supporting documents | 0.25 |
| 10/19/2015 | Both | Arranged interview with John Burns | 0.17 |
| 10/19/2015 | Both | Arranged interview with James West | 0.17 |
| 10/19/2015 | Both | Arranged interview with Josh Stein | 0.17 |
| 10/19/2015 | Both | Arranged interview with Tom Oxholm | 0.17 |
| 10/19/2015 | Both | Emailed legislative counsel re: serving subpoenas | 0.25 |
| 10/20/2015 | Both | Emailed legislative counsel re: serving subpoenas | 0.25 |
| 10/20/2015 | Both | Emails re: witness interview schedule and supporting documents | 0.25 |
| 10/20/2015 | Both | Compiled and printed supporting documents for witness interviews | 2 |
| 10/20/2015 | Both | Researched requirements for service of subpoenas and updated legislative subpoenas | 1 |
| 10/20/2015 | Both | Requested audio recordings of legislative debate on SB325 and SB181 | 1 |

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| 10/20/2015 | Both | Arranged interview with Josh Stein | 0.17 |
| 10/20/2015 | Both | Arranged interview with Dan Blue | 0.17 |
| 10/20/2015 | Both | Arranged interview with Grier Martin | 0.17 |
| 10/20/2015 | Both | Attended witness interviews | 3 |
| 10/21/2015 | Both | Arranged interview with Grier Martin | 0.17 |
| 10/21/2015 | Both | Arranged interview with Dan Blue | 0.17 |
| 10/21/2015 | Both | Typed and emailed notes from Rosa Gill interview | 0.5 |
| 10/21/2015 | Both | Compiled and printed supporting documents for witness interviews | 2 |
| 10/21/2015 | Both | Compiled timeline for expert witness use | 1 |
| 10/21/2015 | Both | Served subpoenas on legislative counsel and mailed to legislative staff | 1.5 |
| 10/21/2015 | Wright | Read Complaint | 0.75 |
| 10/21/2015 | Wright | Read order on motion to dismiss | 0.75 |
| 10/21/2015 | Wright | Read Fourth Circuit opinion | 0.75 |
| 10/22/2015 | Both | Arranged conference space for witness interviews | 0.33 |
| 10/23/2015 | Both | Arranged interview with John Burns | 0.17 |
| 10/23/2015 | Both | Arranged interview with Caroline Sullivan | 0.17 |
| 10/23/2015 | Both | Arranged interview with James West | 0.17 |
| 10/23/2015 | Both | Arranged interview with Bill Fletcher | 0.17 |
| 10/27/2015 | Both | Arranged interview with Amy Womble | 0.17 |
| 10/27/2015 | Both | Arranged conference space for witness interviews | 0.25 |
| 10/28/2015 | Both | Arranged conference space for witness interviews | 0.25 |
| 10/29/2015 | Both | Read draft expert report | 0.5 |
| 10/30/2015 | Both | Emailed legislative counsel re: subpoena service and letters filed with the court | 0.25 |
| 10/30/2015 | Both | Served corrected subpoena on legislative counsel | 1 |
| 10/30/2015 | Both | Picked up audio recordings and pulled committee notes from legislative debate on SB325 and SB181 | 2 |
| 10/30/2015 | Both | Listened to and took notes on legislative debate recordings | 4 |
| 10/30/2015 | Both | Updated timeline | 0.25 |
| 11/2/2015 | Both | Arranged meeting with Tom Oxholm | 0.17 |
| 11/2/2015 | Both | Arranged meeting with Gerry Cohen | 0.17 |
| 11/2/2015 | Both | Drafted RFPs for Gary Sims | 0.75 |
| 11/2/2015 | Both | Listened to and took notes on legislative debate recordings | 4 |
| 11/3/2015 | Both | Listened to and took notes on legislative debate recordings | 2 |
| 11/3/2015 | Both | Requested transcripts of legislative debates on SB325 and SB181 | 0.75 |
| 11/4/2015 | Both | Emails re: transcripts of legislative debates on SB325 and SB181 | 0.25 |
| 11/4/2015 | Both | Read motion to quash legislative subpoenas | 0.5 |

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| 11/4/2015 | Both | Emailed legislative counsel re: public records request | 0.25 |
| 11/4/2015 | Both | Arranged interview with James West | 0.17 |
| 11/4/2015 | Both | Arranged interview with Tom Oxholm | 0.17 |
| 11/4/2015 | Both | Arranged interview with Bill Fletcher | 0.17 |
| 11/4/2015 | Both | Arranged interview with Gerry Cohen | 0.17 |
| 11/4/2015 | Both | Arranged interview with Harvey Schmitt | 0.17 |
| 11/4/2015 | Both | Acquired Womble map of split municipalities | 0.33 |
| 11/5/2015 | Both | Searched legislative transcripts and compiled relevant testimony for potential witness outreach | 1 |
| 11/5/2015 | Both | Researched elected officials in Wake municipalities for potential witness outreach | 0.75 |
| 11/5/2015 | Both | Coordinated intern project to compile news articles related to SB181 and SB325 | 0.25 |
| 11/5/2015 | Both | Arranged interview with Caroline Sullivan | 0.17 |
| 11/5/2015 | Both | Arranged interview with Gerry Cohen | 0.17 |
| 11/5/2015 | Both | Arranged interview with Greg Flynn | 0.17 |
| 11/5/2015 | Both | Arranged interview with Dustin Ingalls | 0.17 |
| 11/5/2015 | Both | Arranged conference space for witness interviews | 0.25 |
| 11/6/2015 | Both | Arranged interview with Bill Fletcher | 0.17 |
| 11/9/2015 | Both | Arranged interview with Dustin Ingalls | 0.17 |
| 11/10/2015 | Both | Arranged interview with Greg Flynn | 0.17 |
| 11/10/2015 | Both | Arranged interview with James West | 0.17 |
| 11/10/2015 | Both | Emails re: transcripts of legislative debates on SB325 and SB181 | 0.5 |
| 11/10/2015 | Both | Emailed legislative counsel re: public records request | 0.17 |
| 11/10/2015 | Both | Researched local rules for citations to unpublished authority | 0.5 |
| 11/10/2015 | Both | Cite checked and edited response to motion to quash, and compiled exhibits | 2 |
| 11/11/2015 | Both | Attended witness interviews | 4 |
| 11/11/2015 | Both | Requested audio recordings of committee meetings on SB325 and SB181 | 1 |
| 11/12/2015 | Both | Requested audio recordings of committee meetings on SB325 and SB181 | 0.33 |
| 11/12/2015 | Both | Read draft of pre-trial brief | 2 |
| 11/13/2015 | Both | Picked up audio recordings of committee meetings on SB325 and SB181 | 1 |
| 11/13/2015 | Both | Call with defense counsel | 0.75 |
| 11/13/2015 | Both | Drafted amended initial disclosures and supplemental disclosures, and served on defense counsel | 2 |
| 11/16/2015 | Both | Read Defendant's RFP responses and amended disclosures | 0.5 |
| 11/16/2015 | Both | Reviewed search terms for RFPs and suggested additions | 0.33 |
| 11/18/2015 | Both | Requested audio recordings of committee meetings on SB325 and SB181 | 0.25 |
| 11/19/2015 | Both | Requested audio recordings of committee meetings on SB325 and SB181 | 0.25 |
| 11/25/2015 | Both | Researched and pulled demographic reports for Wake County | 0.75 |

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|------------|------|-------------------------------------------------------------------------------------|------|
| 11/30/2015 | Both | Trial team meeting re: roles and responsibilities | 1 |
| 11/30/2015 | Both | Arranged interview with Jannet Barnes | 0.17 |
| 11/30/2015 | Both | Arranged interview with Beverley Clark | 0.17 |
| 11/30/2015 | Both | Emails re: transcripts of legislative debates on SB325 and SB181 | 0.5 |
| 11/30/2015 | Both | Edited witness list | 0.25 |
| 11/30/2015 | Both | Read case management order | 0.17 |
| 11/30/2015 | Both | Researched date of legislative press release re: SB181 | 0.5 |
| 11/30/2015 | Both | Reviewed legislative document production | 2 |
| 12/1/2015 | Both | Excerpted transcripts received from legislature for expert witness use | 1 |
| 12/1/2015 | Both | Emails re: subpoenas and legislator comments in the media | 0.17 |
| 12/1/2015 | Both | Correspondence with school board counsel to acquire base attendance maps | 0.5 |
| 12/2/2015 | Both | Organizing exhibits | 0.5 |
| 12/2/2015 | Both | Emails re: witness contact information | 0.33 |
| 12/2/2015 | Both | Drafted trial subpoenas for witnesses | 0.5 |
| 12/3/2015 | Both | Coordinated paralegal calls to arrange witness interviews | 0.25 |
| 12/3/2015 | Both | Correspondence with school board counsel to acquire base attendance maps | 0.25 |
| 12/3/2015 | Both | Drafted facts section for pretrial brief/FoF | 8 |
| 12/3/2015 | Both | Drafted interview outline for Jannet Barnes | 1 |
| 12/3/2015 | Both | Compiled and printed supporting documents for witness interviews | 1 |
| 12/4/2015 | Both | Interviewed Beverley Clark | 1 |
| 12/4/2015 | Both | Typed and emailed notes from Beverley Clark interview | 0.5 |
| 12/4/2015 | Both | Reviewed witness list | 0.25 |
| 12/4/2015 | Both | Reviewed draft trial schedule | 0.17 |
| 12/4/2015 | Both | Attempted to locate missing exhibits | 0.5 |
| 12/5/2015 | Both | Drafted pretrial FoF | 8 |
| 12/6/2015 | Both | Cite checked and edited pretrial brief | 9 |
| 12/7/2015 | Both | Edited and added cites to pretrial brief | 4 |
| 12/7/2015 | Both | Added cites in pretrial FoF and CoL | 2 |
| 12/7/2015 | Both | Drafted joint stipulations of fact | 4 |
| 12/7/2015 | Both | Searched legislative transcripts for quotes relevant to racial gerrymandering claim | 0.33 |
| 12/7/2015 | Both | Coordinated paralegal calls to arrange witness interviews | 0.25 |
| 12/8/2015 | Both | Drafted joint stipulations of fact | 6 |
| 12/8/2015 | Both | Researched previous maps for commission and school board | 0.75 |
| 12/8/2015 | Both | Edited and served subpoenas for school board witnesses | 1 |
| 12/8/2015 | Both | Researched untimely disclosure of witnesses and prejudice | 1 |

| | | | |
|------------|------|----------------------------------------------------------------------|-------------|
| 12/9/2015 | Both | Call with legislative counsel | 0.5 |
| 12/9/2015 | Both | Compiled and printed supporting documents for witness interviews | 2 |
| 12/9/2015 | Both | Emails re: previous and current maps for commission and school board | 0.17 |
| 12/9/2015 | Both | Edited and served subpoenas for commission witnesses | 0.5 |
| 12/10/2015 | Both | Updated draft of joint stipulations of fact | 2 |
| 12/10/2015 | Both | Coordinated paralegal calls to arrange witness interviews | 0.25 |
| 12/10/2015 | Both | Trial team meeting re: roles and responsibilities | 1 |
| 12/10/2015 | Both | Compiled and printed supporting documents for witness interviews | 2 |
| 12/10/2015 | Both | Attended final pretrial conference | 1 |
| 12/10/2015 | Both | Correspondence with Beverley Clark re: base attendance area maps | 0.25 |
| 12/11/2015 | Both | Email with court clerk re: exhibit list in Excel format | 0.33 |
| 12/11/2015 | Both | Emails re: legislative process timeline | 0.17 |
| 12/11/2015 | Both | Research on legislative votes | 0.25 |
| 12/11/2015 | Both | Compiled and printed supporting documents for witness prep | 2 |
| 12/12/2015 | Both | Drafted timeline demonstratives for SB181 and SB325 | 2 |
| 12/12/2015 | Both | Research on county election methods | 1 |
| 12/13/2015 | Both | Emails re: witness contact information | 0.33 |
| 12/14/2015 | Both | Emails re: trial team contact information | 0.17 |
| 12/14/2015 | Both | Reviewed legislative document production | 2 |
| 12/14/2015 | Both | Drafted and served subpoena on Darren Jackson | 0.5 |
| 12/14/2015 | Both | Compiled and printed supporting documents for witness prep | 2 |
| 12/14/2015 | Both | Cite checked and edited first amended stipulations | 1 |
| 12/15/2015 | Both | Reviewed legislative document production | 1 |
| 12/15/2015 | Both | Emails re: witness contact information | 0.17 |
| 12/15/2015 | Both | Emails re: exhibit numbers | 0.33 |
| 12/15/2015 | Both | Printing exhibits | 0.5 |
| 12/16/2015 | Both | Attended trial and took notes | 6 |
| 12/17/2015 | Both | Attended trial and took notes | 6 |
| 12/17/2015 | Both | Responded to media request for copies of complaints | 0.25 |
| 12/17/2015 | Both | Researched adverse inferences | 1 |
| 12/17/2015 | Both | Drafted slide on Arlington Heights factors | 1.5 |
| 12/18/2015 | Both | Attended trial and took notes | 2 |
| 12/21/2015 | Both | Responded to witness interview inquiry | 0.33 |
| | | | |
| | | RWCA ONLY time | 6.58 |

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|-----------|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| | | Wright ONLY time | 11.4 |
| | | Consolidated Cases time | 175.89 |
| | | | |
| | | PRE-BAR EXAM TOTAL | 193.87 |
| | | | |
| 2/29/2016 | Both | Read district court opinion | 4 |
| 3/1/2016 | Both | Email re: client call | 0.5 |
| 3/2/2016 | Both | Email re: client call | 0.17 |
| 3/2/2016 | Both | Client call | 0.75 |
| 3/3/2016 | Both | Drafted talking points for cients | 0.75 |
| 3/10/2016 | Both | Drafted notices of appeal and docketing statements | 2 |
| 3/23/2016 | Both | Drafted request to consolidate; legal research for the same; started drafting docketing statement; call to clerk's office re: order of filing | 6 |
| 3/25/2016 | Both | Drafted representation and corporate disclosure statements, and notice of constitutional challenge | 3 |
| 3/28/2016 | Both | Drafted Docketing Statements in Wright/RWCA; edited notice of constitutional challenge; drafted notices of appearances; drafted corporate disclosure forms; drafted motion to expedite; edited request to consolidate | 10 |
| 4/7/2016 | Both | Call with EDNC clerk's office re: file size of opinion | 0.33 |
| 4/7/2016 | Both | Call with printer re: file size of opinion | 0.17 |
| 4/7/2015 | Both | Drafted table of contents for JA | 6 |
| 4/7/2016 | Both | Drafted oral argument acknowledgement form | 1 |
| 4/8/2016 | Both | Call with defense counsel | 0.5 |
| 4/8/2016 | Both | Excerpted legislative transcripts and election results for JA | 8 |
| 4/8/2016 | Both | Call with Fourth Circuit clerk re: oral argument acknowledgement form | 0.17 |
| 4/8/2016 | Both | Updated oral argument acknowledgement form | 0.25 |
| 4/9/2016 | Both | Emails re: legislator questions about deviations | 0.33 |
| 4/9/2016 | Both | Emails re: Stam statements | 0.33 |
| 4/10/2016 | Both | Excerpted trial transcripts for JA | 10 |
| 4/11/2016 | Both | Email to defense counsel re: JA | 0.25 |
| 4/11/2016 | Both | Compiled JA | 10 |
| 4/12/2016 | Both | Compiled JA | 16 |
| 4/13/2016 | Both | Coordinated with printer re: JA and brief | 0.5 |
| 4/13/2016 | Both | Coordinated with defense counsel re: JA | 0.33 |
| 4/13/2016 | Both | Checked and added cites to appellants' brief | 18 |
| 4/14/2016 | Both | Checked and added cites to appellants' brief | 6 |

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| 4/14/2016 | Both | Compiled JA | 1 |
| 4/14/2016 | Both | Coordinated with printer re: JA and brief | 0.5 |
| 4/14/2016 | Both | Coordinated with defense counsel re: JA | 0.33 |
| 4/15/2016 | Both | Coordinated with printer re: JA and brief | 1 |
| 4/25/2016 | Both | Read appellees' brief | 0.75 |
| 4/26/2016 | Both | Made suggestions for reply brief | 0.75 |
| 4/29/2016 | Both | Helped draft, edited, and cite checked reply brief | 3.5 |
| 5/6/2016 | Both | Researched and drafted notes on remedy | 3 |
| 5/7/2016 | Both | Researched and drafted notes on remedy | 2 |
| 5/8/2016 | Both | Researched and drafted notes on remedy | 1 |
| 5/8/2016 | Both | Researched Fourth Circuit judges | 0.25 |
| 5/9/2016 | Both | Travel to Richmond for oral argument | 2.5 |
| 5/9/2016 | Both | Attended oral argument | 1.5 |
| 5/9/2016 | Both | Travel from Richmond after oral argument | 2.5 |
| 6/1/2016 | Both | Researched missing trial exhibit requested by Fourth Circuit | 0.5 |
| 6/2/2016 | Both | Read and edited response to court's request | 0.33 |
| 7/1/2016 | Both | Read Fourth Circuit opinion | 1 |
| 7/6/2016 | Both | Conference call with clients | 1 |
| 7/6/2016 | Both | Researched requests for costs and fees in E.D.N.C. and Fourth Circuit | 1 |
| 7/7/2016 | Both | Pulled and compiled time records to date in both cases, updated CV for inclusion in fee petition | 1.5 |
| 7/11/2016 | Both | Drafted motion for extension of time and proposed order | 2 |
| 7/12/2016 | Both | Researched attorney fees, expert fees, and litigation expenses in E.D.N.C. and Fourth Circuit | 5 |
| 7/13/2016 | Both | Met with trial team to discuss media strategy | 0.25 |
| 7/13/2016 | Both | Coordinated intern research assignments for remedial briefing | 0.33 |
| 7/14/2016 | Both | Met with trial team to discuss response to legislators' motion to intervene | 0.25 |
| 7/14/2016 | Both | Edited/helped write draft of motion to issue mandate | 2.5 |
| 7/15/2016 | Both | Read SBE letter on remedy | 0.1 |
| 7/18/2016 | Both | Filled in citations and edited remedial brief | 2.5 |
| 7/19/2016 | Both | Filled in citations, edited, and filed response to motion to intervene | 4.5 |
| 8/2/2016 | Both | Emailed previous research on election history | 0.1 |
| 8/2/2016 | Both | Attended hearing on remedy | 2 |
| 8/2/2016 | Both | Researched school board election dates and legislative history in 2013 | 0.25 |
| 8/3/2016 | Both | Proofread post-hearing memorandum | 0.1 |
| 8/4/2016 | Both | Read court order on remedy | 0.1 |
| 8/4/2016 | Both | Emailed Fred McBride plans submitted by legislators | 0.1 |

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|------------|------|--------------------------------------------------------------------------------------------------|------|
| 8/4/2016 | Both | Spoke to two potential witnesses about providing affidavits on remedial maps | 0.75 |
| 8/4/2016 | Both | Coordinated intern research and drafting assignment on motion to strike | 0.66 |
| 8/5/2016 | Both | Met with Anita Earls about strategy for responding to remedial submissions | 0.1 |
| 8/5/2016 | Both | Drafted response to the Court's August 4 Order | 4 |
| 8/5/2016 | Both | Drafted part of memorandum in support of motion to strike | 1 |
| 8/5/2016 | Both | Edited and filled in cites on response to August 4 Order and memo in support of motion to strike | 4 |
| 8/8/2016 | Both | Called 4th Circuit clerk's office to inquire about procedures for filing writ | 0.33 |
| 8/8/2016 | Both | Drafted corporate disclosure statements to file with writ | 1 |
| 8/8/2016 | Both | Edited and filled in cites on petition for writ | 2 |
| 8/8/2016 | Both | Emailed updated legislative map files to Fred McBride | 0.1 |
| 8/8/2016 | Both | Searched trial record for information on precinct splits | 0.25 |
| 8/8/2016 | Both | Researched 4th Circuit rules for expediting appeals and drafted fact section of memo in support | 4 |
| 8/9/2016 | Both | Proofread amended petition for writ | 0.25 |
| 8/9/2016 | Both | Researched E.D.N.C. rules for extensions of time and proposed orders | 2 |
| 8/10/2016 | Both | Rewrote motion for extension of time and proposed order | 3 |
| 8/11/2016 | Both | Emailed with opposing counsel and updated consent motion for extension of time | 1.5 |
| 8/12/2016 | Both | Spoke with opposing counsel, updated consent motion for extension of time, and filed motion | 0.5 |
| 8/17/2016 | Both | Researched 4th Circuit rules for filing bill of costs | 0.5 |
| 8/17/2016 | Both | Proofread declaration in support of bill of costs | 0.1 |
| 8/18/2016 | Both | Read letter from proposed intervenor | 0.25 |
| 8/19/2016 | Both | Drafted talking points for potential media strategy | 2 |
| 8/20/2016 | Both | Drafted alternative talking points for potential media strategy | 1 |
| 8/22/2016 | Both | Read Defendant's response to letter from proposed intervenor | 0.25 |
| 8/22/2016 | Both | Read filings in support of intervention | 0.5 |
| 8/23/2016 | Both | Searched Plaintiffs' remedial filings for information on reverting to prior election method | 0.5 |
| 8/25/2016 | Both | Read court order denying intervention | 0.25 |
| 9/22/2016 | Both | Researched attorney fees, expert fees, and litigation expenses in E.D.N.C. and Fourth Circuit | 2 |
| 9/23/2016 | Both | Researched attorney fees, expert fees, and litigation expenses in E.D.N.C. and Fourth Circuit | 3 |
| 9/26/2016 | Both | Researched and drafted petition for attorney fees and costs | 4 |
| 9/27/2016 | Both | Researched and drafted petition for attorney fees and costs | 3 |
| 10/3/2016 | Both | Researched and drafted petition for attorney fees and costs | 7 |
| 10/4/2016 | Both | Drafted petition for attorney fees and costs | 2 |
| 10/5/2016 | Both | Pulled and compiled time records to date in both cases | 1 |
| 11/13/2016 | Both | Drafted fee petition | 1.5 |
| 11/14/2016 | Both | Drafted fee petition | 3 |

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|------------|------|---------------------------------------------------------------------------------------------------------|---------------|
| 11/21/2016 | Both | Collected materials for fee petition and supporting documentation | 1 |
| 11/22/2016 | Both | Drafted internal declaration in support of fee petition | 1.5 |
| 11/23/2016 | Both | Edited, filled in cites and missing figures, and proofread fee petition; collected supporting materials | 9 |
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| | | POST BAR EXAM TOTAL | 145.74 |
| | | | |
| | | Total Hours Spent | 339.61 |

George Eppsteiner Time Records - RWCA/Wright

| Case | Hours | User | Time Date | DOW | Task | Description |
|-------------|-------|--------------------|------------|-----|------------|---------------------------------------------------------------------------------------------------------------------------|
| Wright/RWCA | 0.6 | Eppsteiner, George | 12/4/2015 | Fri | Analyze | Trial prep including identifying witnesses and finalizing same. |
| Wright/RWCA | 0.8 | Eppsteiner, George | 12/7/2015 | Mon | Analyze | Preparation for trial including begin prep for Kushner, Jackson, Jensen, and Fitzsimmons trial witnesses. |
| Wright/RWCA | 0.5 | Eppsteiner, George | 12/7/2015 | Mon | email to | Review numerous correspondence from opposing counsel regarding pretrial order. |
| Wright/RWCA | 0.4 | Eppsteiner, George | 12/8/2015 | Tue | Conf Call | Call with Christine Kushner regarding testifying at trial. |
| Wright/RWCA | 0.3 | Eppsteiner, George | 12/8/2015 | Tue | Conf Call | Call with Representative Jackson regarding testifying at trial. |
| Wright/RWCA | 2.5 | Eppsteiner, George | 12/9/2015 | Wed | Analyze | Begin drafting outlines for witness testimony and trial preparation. |
| Wright/RWCA | 0.4 | Eppsteiner, George | 12/9/2015 | Wed | Conf Call | Call with client and trial prep regarding same. |
| Wright/RWCA | 1.5 | Eppsteiner, George | 12/10/2015 | Thu | Analyze | Trial preparation including analysis of witnesses to testify and exhibits to use for witnesses and zoom mapping analysis. |
| Wright/RWCA | 1 | Eppsteiner, George | 12/10/2015 | Thu | Analyze | Review legislative transcripts in preparaiton for trial. |
| Wright/RWCA | 0.5 | Eppsteiner, George | 12/11/2015 | Fri | Analyze | Preparation for trial witness meetings. |
| Wright/RWCA | 2.6 | Eppsteiner, George | 12/11/2015 | Fri | Analyze | Preparation for Jackson testimony. |
| Wright/RWCA | 10 | Eppsteiner, George | 12/12/2015 | Sat | Witness pr | Preparation for trial including begin question outlines for Jackson and Kushner. |
| Wright/RWCA | 4 | Eppsteiner, George | 12/13/2015 | Sun | Prepare | Trial preparation including Fitzsimmons and Jensen outlines. |
| Wright/RWCA | 6 | Eppsteiner, George | 12/14/2015 | Mon | Attend | Meetings with Representative Jackson and Kushner in prep for trial. |
| Wright/RWCA | 5.5 | Eppsteiner, George | 12/14/2015 | Mon | Attend | preparation for trial including Fitzsimmons meeting, preparation of witness questions and exhibits. |

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|-------------|-----|--------------------|------------|-----|---------|-------------------------------------------------------------------------------------------------------------------------|
| Wright/RWCA | 7.5 | Eppsteiner, George | 12/15/2015 | Tue | Prepare | Continued trial prep including finalize questions and exhibits for Jackson, Jensen, Fitzsimmons, and Kushner testimony. |
| Wright/RWCA | 6 | Eppsteiner, George | 12/15/2015 | Tue | Prepare | Preparation for trial including review legislative produced documents. |
| Wright/RWCA | 2 | Eppsteiner, George | 12/16/2015 | Wed | Analyze | Preparation for morning witnesses. |
| Wright/RWCA | 4 | Eppsteiner, George | 12/16/2015 | Wed | Attend | Attend first day of trial. |
| Wright/RWCA | 2 | Eppsteiner, George | 12/16/2015 | Wed | Analyze | Preparation for day 2 of trial including preparation evidentiary objections memo. |
| Wright/RWCA | 4 | Eppsteiner, George | 12/16/2015 | Wed | Attend | Attend first day of trial. |
| Wright/RWCA | 2.2 | Eppsteiner, George | 12/16/2015 | Wed | Prepare | Prepare for expert witness testimony. |
| Wright/RWCA | 1.5 | Eppsteiner, George | 12/17/2015 | Thu | Prepare | Morning preparation for trial. |
| Wright/RWCA | 2.5 | Eppsteiner, George | 12/17/2015 | Thu | Attend | Attend day 2 of trial. |
| Wright/RWCA | 4 | Eppsteiner, George | 12/17/2015 | Thu | Draft | Prepare for closing arguments including draft memo on 5% deviation jurisdictions. |
| Wright/RWCA | 2.5 | Eppsteiner, George | 12/17/2015 | Thu | Attend | Attend day 2 of trial. |
| Wright/RWCA | 4 | Eppsteiner, George | 12/17/2015 | Thu | Draft | Continue preparation for closing arguments including continued drafting of memo on 5% deviation jurisdictions. |
| Wright/RWCA | 1 | Eppsteiner, George | 12/18/2015 | Fri | Attend | Morning preparation for closing argument including closing meeting. |
| Wright/RWCA | 1 | Eppsteiner, George | 12/18/2015 | Fri | Attend | Attend Plaintiffs closing argument. |
| Wright/RWCA | 1 | Eppsteiner, George | 12/18/2015 | Fri | Attend | Morning preparation for trial including discussion of closing argument strategy. |
| Wright/RWCA | 0.2 | Eppsteiner, George | 3/28/2016 | Mon | Draft | File notice of appearance for appeal. |
| Wright/RWCA | 0.3 | Eppsteiner, George | 3/28/2016 | Mon | Draft | Edits to appellate documents. |
| Wright/RWCA | 0.4 | Eppsteiner, George | 4/6/2016 | Wed | Analyze | Begin preparing appellate brief. |
| Wright/RWCA | 0.4 | Eppsteiner, George | 4/6/2016 | Wed | Attend | Analyze appellate filings including motion to expedite, granting of motion to expedite, briefing schedule. |
| Wright/RWCA | 7.5 | Eppsteiner, George | 4/9/2016 | Sat | Draft | Draft racial gerrymander section of appellate brief. |
| Wright/RWCA | 1 | Eppsteiner, George | 4/21/2016 | Thu | Analyze | Analyze appellate filings. |
| Wright/RWCA | 1 | Eppsteiner, George | 4/21/2016 | Thu | Analyze | Analyze appellate filings. |
| Wright/RWCA | 0.8 | Eppsteiner, George | 4/22/2016 | Fri | Analyze | Review record on appeal. |

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|-------------|-----|--------------------|-----------|-----|---------|-------------------------------------------------------------------|
| Wright/RWCA | 0.8 | Eppsteiner, George | 4/22/2016 | Fri | Analyze | Review record on appeal. |
| Wright/RWCA | 1.8 | Eppsteiner, George | 4/26/2016 | Tue | Analyze | Review briefs in preparation for drafting reply brief. |
| Wright/RWCA | 1.8 | Eppsteiner, George | 4/26/2016 | Tue | Draft | Review briefs in preparation for drafting reply brief. |
| Wright/RWCA | 0.7 | Eppsteiner, George | 4/27/2016 | Wed | Analyze | Draft outline for reply brief. |
| Wright/RWCA | 0.8 | Eppsteiner, George | 4/27/2016 | Wed | Draft | Continued preparation of reply brief. |
| Wright/RWCA | 2 | Eppsteiner, George | 5/5/2016 | Thu | Attend | Preparation for oral argument. |
| Wright/RWCA | 2 | Eppsteiner, George | 5/5/2016 | Thu | Analyze | Preparation for oral argument. |
| Wright/RWCA | 2.6 | Eppsteiner, George | 5/9/2016 | Mon | Travel | Travel from Office to Richmond for Fourth Circuit Argument. |
| Wright/RWCA | 1.8 | Eppsteiner, George | 5/9/2016 | Mon | Attend | Attend Fourth Circuit Argument. |
| Wright/RWCA | 2.6 | Eppsteiner, George | 5/9/2016 | Mon | Travel | Return travel from Fourth Circuit argument in Richmond to office. |

TOTAL TIME 110.3

RWCA/Wright - Christopher Ketchie Time Records

| Project | Hours | User | Time Date | DOW | Task | Description |
|---------|-------|-------------------------|-----------|-----|----------|-------------------------------------------|
| Wright | 1 | Ketchie, Christopher D. | 3/29/2013 | Fri | Analyze | proposed district plans |
| Wright | 5 | Ketchie, Christopher D. | 4/30/2013 | Tue | Analyze | import shapefiles |
| Wright | 4 | Ketchie, Christopher D. | 5/3/2013 | Fri | Analyze | geocode plaintiff residences |
| Wright | 5 | Ketchie, Christopher D. | 5/7/2013 | Tue | Analyze | examine population data |
| Wright | 6.25 | Ketchie, Christopher D. | 5/8/2013 | Wed | Analyze | review alternative plans |
| Wright | 8 | Ketchie, Christopher D. | 6/7/2013 | Fri | Analyze | examine equal population alternatives |
| Wright | 4 | Ketchie, Christopher D. | 6/10/2013 | Mon | Research | alternative district configurations |
| Wright | 2 | Ketchie, Christopher D. | 6/12/2013 | Wed | Research | new district population data |
| Wright | 4 | Ketchie, Christopher D. | 6/13/2013 | Thu | Research | comparison of previous plans |
| Wright | 4.5 | Ketchie, Christopher D. | 6/19/2013 | Wed | Analyze | partisan impacts of new plans |
| Wright | 4 | Ketchie, Christopher D. | 6/20/2013 | Thu | Analyze | partisan impacts of new plans |
| Wright | 6 | Ketchie, Christopher D. | 6/24/2013 | Mon | Analyze | Stam amendments |
| Wright | 3 | Ketchie, Christopher D. | 6/27/2013 | Thu | Analyze | partisan impacts of new plans |
| Wright | 2 | Ketchie, Christopher D. | 8/7/2013 | Wed | Analyze | Precinct Update for Clients |
| Wright | 5.5 | Ketchie, Christopher D. | 8/14/2013 | Wed | Analyze | Stats comparing plans |
| Wright | 3 | Ketchie, Christopher D. | 8/21/2013 | Wed | Analyze | Analysis for client (Maps and Statistics) |

WRIGHT ONLY TIME
67.25

| | | | | | | |
|-------------|------|-------------------------|-----------|-----|---------|---------------------------------------------------------------------|
| Wright/RWCA | 0.25 | Ketchie, Christopher D. | 3/9/2015 | Mon | Analyze | Comparison between Wake School Board and BOCC Districts for Allison |
| Wright/RWCA | 4 | Ketchie, Christopher D. | 3/13/2015 | Fri | Analyze | Wake County Redistricting (Numbered District Alternative) |
| Wright/RWCA | 6 | Ketchie, Christopher D. | 3/16/2015 | Mon | Analyze | Redistricting / Incumbent & Plaintiff Geocoding |

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|-------------|------|-------------------------|-----------|-----|----------|-----------------------------------------------------------------------------|
| Wright/RWCA | 0.5 | Ketchie, Christopher D. | 3/17/2015 | Tue | email to | Preparing Block Assignment Files - Emailing Instructions to Erika Churchill |
| Wright/RWCA | 0.75 | Ketchie, Christopher D. | 3/18/2015 | Wed | Research | Checking Additional Plaintiff Geocodes / D4 Precinct List |
| Wright/RWCA | 0.75 | Ketchie, Christopher D. | 4/1/2015 | Wed | Research | Checking Additional Plaintiff Geocodes / D4 Precinct List |
| Wright/RWCA | 0.5 | Ketchie, Christopher D. | 4/7/2015 | Tue | Research | Plaintiff District Lookup for Anita |
| Wright/RWCA | 0.5 | Ketchie, Christopher D. | 4/8/2015 | Wed | Research | Plaintiff District Lookup for Anita |
| Wright/RWCA | 2.5 | Ketchie, Christopher D. | 4/8/2015 | Wed | Analyze | Wake County Commissioner District Split Precinct Analysis for Anita |
| Wright/RWCA | 1 | Ketchie, Christopher D. | 4/9/2015 | Thu | Research | Plaintiff District Lookup for Anita |
| Wright/RWCA | 3 | Ketchie, Christopher D. | 4/9/2015 | Thu | Research | Reading Harris v. McCrory Analysis |
| Wright/RWCA | 3.25 | Ketchie, Christopher D. | 4/13/2015 | Mon | Analyze | Wake County Districts - Precinct Assignments for Plaintiff Identification |

TOTAL TIME

90.25

RWCA/Wright - Fred McBride - Time Records

| Project | Hours | User | Time Date | DOW | Task | Description |
|-------------|-------|------------------|------------|-----|-----------|--------------------------------------------------------------------------------|
| RWCA/Wright | 1 | McBride, Fred G. | 10/11/2015 | Sun | Conf Call | conf call with expert |
| RWCA/Wright | 4 | McBride, Fred G. | 10/12/2015 | Mon | Analyze | Review/research complaint, maps, data, construct and send shape file to expert |
| RWCA/Wright | 1.6 | McBride, Fred G. | 10/14/2015 | Wed | Analyze | analyze election returns, call with expert |
| RWCA/Wright | 3.5 | McBride, Fred G. | 10/15/2015 | Thu | Analyze | Format election returns to csv file, call with expert |
| RWCA/Wright | 6.3 | McBride, Fred G. | 10/16/2015 | Fri | Analyze | Format election returns to csv file, call with expert |
| RWCA/Wright | 6.6 | McBride, Fred G. | 10/19/2015 | Mon | Analyze | Format election returns to csv file |
| RWCA/Wright | 7.3 | McBride, Fred G. | 10/20/2015 | Tue | Analyze | Format election returns to csv file |
| RWCA/Wright | 6.3 | McBride, Fred G. | 10/21/2015 | Wed | Analyze | Format election returns to csv file |
| RWCA/Wright | 3.1 | McBride, Fred G. | 10/27/2015 | Tue | Analyze | Format election returns to csv file, research candidate pol info |
| RWCA/Wright | 6.7 | McBride, Fred G. | 10/29/2015 | Thu | Analyze | Format election returns to csv file, research candidate pol info |
| RWCA/Wright | 7.7 | McBride, Fred G. | 10/30/2015 | Fri | Analyze | Format election returns to csv file, research candidate pol info |
| RWCA/Wright | 0.8 | McBride, Fred G. | 11/5/2015 | Thu | Analyze | Format election returns to csv file, research candidate pol info |
| RWCA/Wright | 2 | McBride, Fred G. | 11/16/2015 | Mon | Analyze | Prepare work product for Defendant's Doc Request |
| RWCA/Wright | 0.3 | McBride, Fred G. | 11/17/2015 | Tue | Analyze | Prepare work product for Defendant's Doc Request |
| RWCA/Wright | 0.5 | McBride, Fred G. | 12/1/2015 | Tue | Analyze | Prepare work product for Defendant's Doc request |
| RWCA/Wright | 5.8 | McBride, Fred G. | 12/2/2015 | Wed | Analyze | Analysis of expert report, research methodology used |
| RWCA/Wright | 0.2 | McBride, Fred G. | 12/3/2015 | Thu | Analyze | email expert re travel |
| RWCA/Wright | 1 | McBride, Fred G. | 12/4/2015 | Fri | Analyze | Review expert travel details |
| RWCA/Wright | 7.3 | McBride, Fred G. | 12/12/2015 | Sat | Analyze | Prepare maps, exhibits for trial |
| RWCA/Wright | 5.8 | McBride, Fred G. | 12/14/2015 | Mon | Prepare | Trial prep, review experts, witness list |
| RWCA/Wright | 9 | McBride, Fred G. | 12/15/2015 | Tue | Review | Trial prep, review experts, witness list |
| RWCA/Wright | 12.2 | McBride, Fred G. | 12/16/2015 | Wed | Attend | 1st day of trial |
| RWCA/Wright | 9.2 | McBride, Fred G. | 12/17/2015 | Thu | Attend | 2nd day of trial |

TOTAL TIME
108.2

RWCA/Wright Time Records - Jaclyn Maffetore

| Name | Date | Work Description | Case | Time Spent |
|------------------|----------------|------------------------------------------------------------------------------------------------------|--------------|-------------------|
| Jaclyn Maffetore | March 1, 2016 | Reading recently issued opinion on our case to prepare for appeal | RWCA | 4.0 |
| Jaclyn Maffetore | March 2, 2016 | Reading recently issued opinion on our case to prepare for appeal, picking out errors of fact or law | RWCA | 2.5 |
| Jaclyn Maffetore | March 2, 2016 | Researching deadlines following notice of appeal and creating chart | RWCA | 0.8 |
| Jaclyn Maffetore | March 3, 2016 | Researching deadlines following notice of appeal and creating chart | RWCA | 0.5 |
| Jaclyn Maffetore | March 9, 2016 | Reviewing trial court findings of fact | RWCA | 1.5 |
| Jaclyn Maffetore | March 14, 2016 | Proofreading notices of appeal | RWCA | 0.5 |
| Jaclyn Maffetore | April 6, 2016 | Researching weight afforded to legislative testimony | RWCA | 6.2 |
| Jaclyn Maffetore | April 7, 2016 | Researching and drafting memo on weight afforded to legislative testimony | RWCA | 3.5 |
| Jaclyn Maffetore | April 7, 2016 | Researching clearly erroneous standard of review | RWCA | 5.2 |
| Jaclyn Maffetore | April 8, 2016 | Researching and drafting research memo on clearly erroneous standard of review | RWCA | 6.8 |
| Jaclyn Maffetore | April 12, 2016 | Compiling and editing trial exhibits and ordering them to form portion of Joint Appendix for appeal | RWCA | 5.8 |
| Jaclyn Maffetore | April 13, 2016 | Adding citations to draft brief from joint appendix | RWCA | 5.0 |
| Jaclyn Maffetore | April 14, 2016 | Proofreading brief for appeal | RWCA | 2.0 |
| | | | Total | 44.3 |

Wright RWCA Legal Fellow Time

| Date | Timekeeper | Case | Hours | Task | Description |
|--------------|-----------------|--------|--------------|-----------------------|-----------------------------------------------------------------------|
| 3/21/2013 | Collins, Jeremy | Wright | 0.25 | Conf. | meeting with Anita to discuss conducting client conference, retainers |
| 3/27/2013 | Collins, Jeremy | Wright | 0.35 | Conf. | Conference with Anita, review Wake Co. Sch. Bd. bill |
| 4/2/2013 | Collins, Jeremy | Wright | 2 | Meeting | in Raleigh with Anita & clients |
| 4/3/2013 | Collins, Jeremy | Wright | 0.5 | emails | to clients re signing retainer agreements |
| 4/4/2013 | Collins, Jeremy | Wright | 1.5 | Telephone call-Client | calls to clients to obtain signed copies of retainer agreements |
| 6/10/2013 | Collins, Jeremy | Wright | 3.4 | Legal Research | re: one-person, one vote claims |
| 6/11/2013 | Collins, Jeremy | Wright | 4.5 | Draft | legal memorandum on voting rights cases |
| 6/12/2013 | Collins, Jeremy | Wright | 2.25 | Edit | draft brief and update research |
| 8/5/2013 | Collins, Jeremy | Wright | 0.25 | Conf. | with Anita to review clients in school board case |
| 8/5/2013 | Collins, Jeremy | Wright | 2.5 | Meeting | with potential clients in Raleigh |
| 8/6/2013 | Collins, Jeremy | Wright | 0.3 | Research | information about precincts in districts, email to Yevonne Brannon |
| 8/7/2013 | Collins, Jeremy | Wright | 0.25 | Email | to clients with retainer agreements |
| 8/12/2013 | Collins, Jeremy | Wright | 0.6 | Review | draft complaint |
| 8/21/2013 | Collins, Jeremy | Wright | 2.3 | Legal Research | re: proper defendants for constitutional claims & memo to Allison |
| 8/22/2013 | Collins, Jeremy | Wright | 0.8 | Draft | email to clients attaching filed documents and explaining next steps |
| Total | | | 21.75 | | |
| 7/14/2014 | Heaney, Chris | Wright | 2.45 | Research | cases related to legal issues raised by reply brief |
| 7/15/2014 | Heaney, Chris | Wright | 1.33 | Review | reviewing briefs for 4th Circuit appeal |
| 7/15/2014 | Heaney, Chris | Wright | 1.58 | Edit | revising reply brief |
| Total | | | 5.36 | | |
| 4/13/2015 | Crupi, Joseph | RWCA | 5 | Prepare | Pleadings file |
| 6/17/2015 | Crupi, Joseph | RWCA | 0.75 | Review | Additional pleadings and organize files |
| 8/24/2015 | Crupi, Joseph | RWCA | 2.5 | Prepare | Additional pleadings for file |
| Total | | | 8.25 | | |